



1002787

TO: DR. INGRID RITCHIE, INDIANAPOLIS AIR POLLUTION CONTROL
BOARD
FROM: PAM THEVENOW, MARION COUNTY HEALTH DEPARTMENT
SUBJECT: SOIL LEAD-REFINED METALS AREA
DATE: SEPTEMBER 22, 1994

Most of the soil lead samples taken by MCHD at the request of the nearby residents was less than 300 ppm. Those samples with soil lead results approaching or greater than 400 ppm are described in greater detail below.

2961 S Arlington-grab samples

68 ppm-eastside of house
127 ppm-northside of house
399 ppm-southside of house
423-ppm-westside of house

330 E Churchman-grab samples--Beech Grove Fire Department-grab samples

109 ppm-north property line by creek
192 ppm-west property line
368 ppm-south along Churchman Av by the road

3309 S Arlington-

134 ppm-grab sample, front yard near large bush
245 ppm-grab sample, back of house east end of field
266 ppm-composite sample, garden at each end and middle
294 ppm-grab sample, back of house approx. 1/4 into field
308 ppm-grab sample, back of house south edge of field
334 ppm-grab sample, back field in low area
357 ppm-grab sample, north end of field back of house
541 ppm- grab sample, middle of south field
611 ppm-grab sample, front yard middle
634 ppm-composite sample, barn area
2060 ppm-composite sample-near house foundation all four sides

Analysis of paint chip sample (discolored area on house) showed fungal growth.

Analysis of lettuce leaf (unwashed) sampled on 6-16-94 has a result of 71 ppm. Another sample collected on 7-15-94 of a lettuce leaf washed had a result of less than detectable lead. A lettuce leaf from a grocery store (washed) was also analyzed to determine possible background for produce. This sample had a result of 17 ppm. All fruits and vegetables should be washed prior to eating as lead deposition is wide spread in the environment. Refined Metals emissions could contribute to increased lead on food products via emissions from this facility.

3560 Big Four-Refined Metals property line-grab samples

2100 ppm-along Refined Metals property line and L&G tank
4020 ppm-northeast corner Refined Metals and L&G tank
4060 ppm-southeast corner

DISCUSSION

The EPA is developing a rule (Section 403 TSCA, 15 USC 2683) to address the hazards of residential lead-based paint hazards, which includes lead dust and soil in and around homes. In July 1994, US EPA released an interim guidance based on current information in response to increased requests from State and EPA regional offices as well as public health and housing personnel about this issue.

In this guidance document (enclosed), EPA recommends that soil lead concentrations that exceed 400 ppm in bare soil "... further evaluation should be undertaken and physical exposure-reduction activities, commensurate with the expected degree of risk, are appropriate." The 400 ppm level was selected based on the following:

1. This level should help in reducing the threat that environmental lead poses to the public. EPA estimates that beginning exposure reduction activity at 400 ppm will help ensure that a typical child or group of children exposed to lead would have an estimated risk of no more than 5% of exceeding a blood lead level of 10 ug/dl. (Note: this may change in Section 403 rule making).

2. EPA feels a level that is protective for young children is expected to be protective for older population subgroups due to a young child's increased sensitivity to lead exposure.

The attached table represents EPA's current interim guidance for exposure reduction based on soil lead concentrations and determination if children are likely to be frequently present at the location. EPA guidance for soil lead levels between 400 ppm - 5000 ppm in bare soil where children are likely to be present is to change use patterns (i.e., restricting play activities) and/or to establish barriers between children and the bare contaminated soil by planting ground cover. Above 5000 ppm EPA guidance is to remove/replace contaminated soils or to establish permanent barrier such as paving the area. Soil lead levels between 2000 ppm to 5000 ppm, but children having contact is less likely or infrequent, EPA recommend access restriction and or establishing barriers. Levels above 5000 ppm the recommended control is to remove/replace soil or to provide a permanent barrier.

The soil leads found in the surrounding yards and businesses were all less than 1000 ppm except for 3309 S Arlington result of 2060 ppm. This composite sample taken near the foundation of a house built before 1980. Lead paint is suspected to be a factor. Other sample results from this property ranged from 134 ppm to 634 ppm. The sample locations varied widely. Lead disposition from the Refined Metals plant could be a factor as this house is very close and lies within prevailing wind direction. The sample with the result of 868 ppm (330 E Churchman) was near a busy thorough fare. Lead gasoline deposition is suspected to be a factor as sample results taken further from this thoroughfare dropped to under 200 ppm.

Residents received all sample results. MCHD staff advised owners as to their risk levels and reduction control methods they may wish to follow based on the EPA information available then. These included: access restrictions, providing ground cover, frequent handwashing especially before eating or drinking and good nutrition practices to reduce lead absorption. EPA prior to the July, 1994, guidance document had repeatedly stated that soil lead levels of 500 ppm to 1000 ppm is generally considered background levels. Based on the sample results these control measures are still recommended in EPA's most current guidance statement.

**REFINED METALS CORPORATION
3700 S. ARLINGTON AVE
INDIANAPOLIS, INDIANA**

REPORT ON ACTIVITIES

PREPARED BY :

**CITY OF INDIANAPOLIS
ENVIRONMENTAL RESOURCES
MANAGEMENT DIVISION**

**AIR POLLUTION
CONTROL SECTION**

August 11, 1994

BACKGROUND

Refined Metals Corporation, 3700 S. Arlington Avenue, is a secondary lead smelter located in Franklin Township in the southeastern portion of Marion County. This area of Marion County has been designated a non-attainment area by the United States Environmental Protection Agency (USEPA) for exceedances of the National Ambient Air Quality Standard for lead. The boundaries of this area in Franklin Township are Troy Avenue on the north, Five Points Road on the east, Thompson Road on the south, and Emerson Avenue on the west (see map - Attachment A). A designation of lead non-attainment is made if monitored readings of the ambient air exceed the air quality standard of 1.5 ug per cubic meter of air when averaged over a calendar quarter.

Once an area is designated non-attainment for any of the air quality standards, a State Implementation Plan, or SIP, must be developed to bring the area back into attainment. The SIP is a plan developed to address the non-attainment pollutant and outline specific tasks that will be accomplished to make sure the high readings are reversed. For the lead non-attainment problem around Refined Metals, the SIP includes a comprehensive lead inventory in the non-attainment area, the development of a source-specific regulation to address Refined Metals, and four quarters of monitored lead readings below the lead standard.

HISTORY

The 3700 S. Arlington Avenue address has a history of violations of various air pollution control regulations dating back many years. However, for the purposes of this document the discussion will be limited to the source currently located at this facility.

Refined Metals Corporation, presently operating at 3700 S. Arlington Avenue, began operation of this plant in 1980. However, the exact date of start-up of this facility is not on file with the Air Pollution Control Section. The earliest correspondence to Refined Metals concerns the blast furnace, and was made during August 1980. Prior to this correspondence, all references in the files are made to National Lead.

A six page enforcement history of Refined Metals is in Attachment B for reference. This attachment includes federal, state, and local actions through April 1994. More recent actions will be discussed later in this report.

PLANT OPERATION

A secondary lead smelter produces different grades of lead ingots by recycling scrap materials containing lead. In the case of Refined Metals, 70% of their scrap material is scrap automobile batteries, 20% is scrap industrial batteries, and 10% is "plant scrap". "Plant scrap" is mostly manufactured battery plates, not up to industry standards, which are collected and remelted. From this, Refined Metals produces "soft" lead and "hard" lead. "Soft" lead is 99% pure lead. This constitutes approximately 70% of Refined Metals' business. The remaining 30%, is made up from special orders for different grades of "hard" lead, or lead compounds. The consistency of the lead compounds depends entirely on the order specifications. Lead is combined with differing amounts of antimony, tin, or arsenic to form the various grades requested.

The smelting process consists of three basic steps: Breaking the batteries to remove and separate the lead bearing materials from the plastic case and acid electrolyte; using the blast furnace to melt the lead compounds and reduce the compounds to lead metal; and, using refining kettles to refine the lead compounds to meet customer specifications. At Refined Metals, these steps consist of using the following process equipment which have the potential for air emissions.

Battery Breaker - Battery breaking recovers the lead plates from the spent lead-acid batteries. Battery tops are sheared off the batteries, and the batteries are conveyed to a tumbling mill which separates the cases from the lead plates. The battery tops and cases are then conveyed to a hammermill. After breaking in the hammermill, the broken cases are sent to water wash for cleaning before shipping to a recycling plant. The battery acids collect in a pit during the top shearing process and are pumped into collection tanks. The lead plates from the batteries are moved to a materials storage and handling area.

Blast Furnace - The lead plates are charged to a blast furnace to reduce the lead oxide (battery plates) to elemental lead. Additional constituents of the charge include coke, limestone, iron, and slag. Exhaust from the blast furnace is controlled by the M-1 baghouse. Emissions from the charging, slag tapping and cooling, and lead tapping operations are controlled by the M-2 baghouse.

Dust Furnace - Dust collected from the baghouses is conveyed to the dust furnace directly for remelting, or conveyed to the material storage building for temporary storage and later processing. Approximately 200 tons per month of dust are collected from all of the baghouses. Dust furnace exhaust emissions and charging emissions are vented to the M-1 baghouse. Dust furnace tapping is controlled by the M-2 baghouse.

Refining Kettles - Seven refining kettles are used to produce the lead alloys needed to meet customer orders. In addition to the elemental lead charged to these kettles, other compounds include sulfur, iron pyrite, sodium hydroxide, potassium hydroxide, red phosphorous, antimony, tin, and arsenic. Emissions from the refining kettles are processed by the M-3 baghouse.

The number of potential pollutants emitted from a blast furnace at a secondary lead smelter is significant. A listing of these pollutants includes:

Sulfur Dioxide	Particulates
Carbon Monoxide	Lead
Antimony	Arsenic
Benzene	Carbon Disulfide
1-3-Butadiene	Methyl Chloride
Styrene	Dioxins/Furans (trace amounts)
2,3,7,8-tetrachlorodibenzo-p-dioxin	Chlorine Gas
Hydrochloric Acid Fumes	Sulfuric Acid Fumes
Sulfides	Sulfates

This pollutant list does not list all pollutants potentially emitted from secondary lead smelters. Approximately 30 separate organic Hazardous Air Pollutants (HAP) have been identified as being potentially emitted from uncontrolled blast furnaces.

CURRENT ACTIVITY

On May 16, 1994, the Lowell Civic League hosted a public meeting concerning Refined Metals. Several regulatory agencies were asked to attend and discuss current actions being taken in regards to Refined Metals. The biggest concern brought forth at the meeting was a concern for the health and safety of the citizens living in the area.

The Indianapolis Air Pollution Control Section (IAPCS), the Indiana Department of Environmental Management (IDEM), and the Marion County Health Department (MCHD) immediately intensified an ongoing investigation of the potential emissions from Refined Metals. Based on several years of violations of the NAAQS for lead in the area around Refined Metals, an initial sampling was conducted for potential lead exposures. MCHD conducted blood lead level testing for citizens in the area, well water sampling for lead content, and soil sampling in the area for lead contamination. Simultaneously, IAPCS began daily surveillance and weekly unannounced inspections of the plant. In addition, IAPCS established a third lead monitoring site south of the plant, and a Sulfur Dioxide monitoring site northeast (downwind) of the plant. All data obtained from the aforementioned sampling indicate no elevated levels of lead or SO₂ (Attachment C).

However, as indicated above, there are many additional pollutants which may be emitted from a secondary lead smelting operation. IDEM, in an effort to make immediate reductions in potential emissions from Refined Metals of both lead and other pollutants, entered into an Agreed Order with Refined Metals which requires immediate steps to be taken to eliminate the potential fugitive emissions of various pollutants. Included in these steps are requirements for pressure washing the exterior drive at the plant, elimination of exterior tracking, sealing the Material Storage Building, and bringing the Material Storage Building under negative pressure. These requirements essentially eliminate fugitive emissions from escaping the facility.

The most prevalent complaint received by IAPCS concerning Refined Metals over the last several months has related to an odor emanating from the plant. The odor was described most often as a gunpowder or firecracker type odor. IAPCS has attempted to correlate the odor complaints with charging records at Refined Metals. This was done in an attempt to isolate a particular plant upset or change in operation with the formation of the odor. All attempts to date have been unsuccessful. No specific operating scenario or material charge to the furnaces appears to produce the odor. A log of all complaints received through July with the accompanying wind direction and speed is included as Attachment D. Recently, complaints concerning the facility have decreased dramatically. During the period May through July, IAPCS received a total of 154 odor complaints. During the period July 28, 1994 through August 8, 1994, no odor complaints were received from the area around Refined Metals.

As stated earlier, many of the potential pollutants are not criteria pollutants and are pollutants for which IAPCS does not normally sample. Therefore, IAPCS solicited the help of the lab at IDEM to conduct additional sampling. Several summa polished canisters were used by IAPCS Inspectors and private citizens during peak odor episodes to collect a "grab" sample for analysis. The IDEM lab ran tests for 70 different compounds. Fifty six compounds were identified in the samples. However, according to the IDEM lab, none of the samples exceeded concentrations normally found in industrial areas, nor were the compounds present in sufficient concentrations to be considered hazardous. Attachment E lists the compounds IDEM identified and the concentrations found. All samples analyzed were taken during peak odor episodes.

FUTURE CONSIDERATIONS

USEPA recently proposed standards for new and existing secondary lead smelters. These standards are listed in a proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) rule. The intent of the standards is to reduce HAP emissions from secondary lead smelters to the maximum degree achievable using maximum achievable control technology (MACT). These standards, once finalized, should help to reduce some of the potential emissions associated with secondary lead smelters.

IAPCS, IDEM and MCHD are continuing to work together with the citizens in the area, the IAPCS Board, and various others to identify the potential emissions from Refined Metals Corporation, and ultimately bring this source into permanent compliance with existing and proposed rules. USEPA has an existing Notice of Violation which has been issued to this facility for previous violations of air quality rules. In addition, IDEM is working with IAPCS to develop a final Agreed Order for previous violations of state rules. The Agreed Order signed in May by IDEM and Refined Metals is in no way a final Agreed Order. The purpose of the May Agreed Order is to bring immediate relief to a serious air quality situation. The measures outlined in the order required Refined Metals to comply by a July 20, 1994 deadline or potentially face closure. As of August 4, 1994, Refined Metals was essentially in compliance with the order. There are two items of the order for which Inspectors found continued problems.

The first involves continued tracking of material outside the Material Storage Building. Refined Metals has made substantial progress in eliminating this problem. The August 4 inspection revealed one instance of tracking. The material was wet, and when brought to the attention of the plant official on duty, was cleaned up immediately. However, this poses a significant question for regulators. If the tracking took place during an inspection of the plant, after the final compliance date and when our presence is definitely known, what happens when we are not present?

The second problem involves sealing the Material Storage Building. The Agreed Order requires Refined Metals to seal the Material Storage Building so that no visible openings remain. During the August 4 inspection, several holes, approximately the size of a quarter, were observed in the Material Storage Building. These holes conflict with the requirement of the Agreed Order. However, a negative pressure was being maintained during the inspection, and air was felt coming into the building through these holes. As long as negative pressure is maintained, fugitive leaks through these holes are not probable.

IAPCS is pursuing several measures to identify additional potential pollutants and levels of emissions. A letter to Refined Metals requiring stack testing of several stacks (Attachment F) was sent in late July. IDEM requires a minimum of 35 days notice of any stack testing in the state. The letter requires Refined Metals to stack test within 60 days. Therefore, the stack testing should be accomplished by the end of September, but can't be accomplished before the last of August or the first of September. IAPCS will be in attendance to observe the testing, and will observe the charges to the blast furnace to insure that all materials identified as being charged during normal operation will be charged during the testing.

In addition, IAPCS has solicited proposals from two consulting firms to conduct additional air sampling in the neighborhood around the plant. IAPCS does not have the sampling capability for several of the pollutants suspected of being emitted from the facility. The use of the consulting firms will provide the additional sampling for which IAPCS is not capable of conducting. Proposals from both firms have been received. Additional questions have been prepared and mailed to both firms to further identify their proposals. Copies of the proposals and letters from IAPCS are included as Attachment G. The IDEM lab is analyzing samples from filters provided by IAPCS for sulfates. These data should be available soon.

A citizen workgroup has been formed with the Franklin Township Civic League, several regulatory agencies, Citizens Leading Environmental Action for Neighborhoods (CLEAN), and other interested parties to discuss actions taken to resolve the problems and citizen concerns. The initial meeting, held on August 4, 1994, was well attended and very productive. The group intends to continue meeting until all neighborhood concerns about Refined Metals have been addressed and Refined Metals is in full permanent compliance with applicable air pollution regulations.

A revised Operating Permit for Refined Metals has been drafted by IAPCS and has been sent to IDEM for comment. The draft permit is much more restrictive than the existing permit. The permit will be submitted for public hearing, and time will be granted for public comment. The procedures used for the public hearing will follow the requirements needed for a SIP revision. This will allow IDEM to submit the final permit to USEPA as a revision to the lead SIP for Marion County. It will also make the requirements of the permit federally enforceable. This will provide more enforcement authority for USEPA, IDEM, and IAPCS in the event of future violations by Refined Metals. The permit is in the final stages of drafting and should be completed within two weeks.

CONCLUSIONS / RECOMMENDATIONS

There are several procedures IAPCS is following to continue the investigation concerning Refined Metals. These are outlined below:

- 1/ Continue weekly and/or daily monitoring of this facility to insure continued compliance with the IDEM Agreed Order and existing air pollution regulations.
- 2/ Pursue contracts with private consulting firms to conduct additional air sampling for toxic pollutants in the neighborhoods around Refined Metals. This will provide additional information concerning potential exposure of residents.
- 3/ IAPCS will continue to work with IDEM in developing the final Agreed Order. When developed, this Order must contain substantial penalties and specific requirements to insure continued permanent compliance of this facility if operations continue.
- 4/ Continue to revise the operating permit. The permit is an important part of the compliance process. It must contain specific and enforceable requirements to insure continued operations without allowing violations, and contingency measures to provide specific actions for violations of air pollution regulations including immediate cessation of operations for any violations of the National Ambient Air Quality Standard for lead.
- 5/ Participate in the citizen workgroup meetings. The meetings help significantly in promoting good communications between the neighborhood citizens and regulatory agencies. The citizen meetings provide an excellent venue for answering questions and providing the citizens with updates on actions taken to resolve the problems.
- 6/ Diligently monitor the upcoming stack tests, and charges to the blast furnace during the stack tests. This will insure compliance with the proper USEPA testing criteria and that the charges contain materials normally fed to the blast furnace. The results of the stack testing should provide additional information on the emissions from the stacks at this plant.

Refined Metals has a history of air pollution violations. Poor housekeeping and sloppy work practices have added to the difficulty in bringing this facility into compliance. The strong odors and prior lead standard violations recorded in this area of Marion County have been linked to the Refined Metals operations. However, the procedures outlined in the Code of Indianapolis and Marion County and in Indianapolis Air Pollution Control Board regulations provide specific and limited options for managing these types of air pollution violations. Continued noncompliance actions of this facility will not be allowed.

Additional comments, or suggestions are welcome.




CITY OF INDIANAPOLIS

STEPHEN GOLDSMITH
MAYOR

Memorandum

TO: Interested Parties

FROM:  Richard L. Martin, Jr., Assistant Administrator
Air Pollution Control Section
Department of Public Works

DATE: May 24, 1994

RE: History of Refined Metals, 3700 South Arlington Avenue, Beech Grove

In February 1986, the Indianapolis Air Pollution Control Section (IAPCS) issued a Notice of Violation (NOV) to Refined Metals Corporation, Inc. (Refined Metals) for fugitive dust emissions from the blast furnace.

- Refined Metals and IAPCS met on February 26, 1986 to discuss the elements of an approvable compliance program.
- Refined Metals submitted a compliance program to IAPCS - March 20, 1986.
- Refined Metals completes minor repairs to the ductwork and collectors - April 1986.
- IAPCS drafted a Consent Decree which was submitted to the City Prosecutor - May 1986 and submitted to Refined Metals for review - June 1986.
- Consent Decree was signed - November 10, 1986.
- IAPCS conducts inspection - November 12, 1986.
- New hood and baghouse installation to be completed - February 1987.
- IAPCS and the Indiana Department of Environmental Management (IDEM) conduct inspection. Refined Metals announces delay in completion of modifications - February 18, 1987.
- IAPCS conducts inspection. The inspection confirms lack of progress with respect to the requirements of the Consent Decree and with the State Lead SIP. IAPCS discussed the possibility of enforcement action with IDEM. - June 22, 1987.

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IDEM issues Refined Metals a NOV for not meeting the compliance schedule contained in the Lead SIP - August 6, 1987.

- IDEM, IAPCS, and Refined Metals met to discuss the resolution of the NOV - August 27, 1987.
- IDEM and IAPCS conduct inspection and determine that the hooding systems, ductwork, and baghouse modifications have been completed - October 15, 1987.

Stack tests were conducted on the baghouse outlets to determine compliance - week of November 16, 1987. Results showed the baghouse out of compliance.

- Refined Metals was placed on EPA's Significant Violators List - March 1988.

IDEM issued NOV (Cause Number A-1031) to Refined Metals for failing to comply with the SIP limits - May 13, 1988.

- Refined Metals, IDEM, and IAPCS met to discuss the resolution of the NOV - June 8, 1988. Refined Metals proposed new SIP limits and examined the feasibility of installing Continuous Emission Monitors (CEMs).

EPA issued Refined Metals a NOV (EPA-5-89-A-10) for failure to comply with the particulate and lead limits in the Lead SIP - November 16, 1988.

- IDEM and IAPCS received and reviewed proposed changes to the SIP limit and supporting information - January 1989.
- Conference held between Refined Metals, EPA, and IDEM. EPA requested IDEM to strengthen the draft Agreed Order for the resolution of the IDEM NOV - January 12, 1989.

EPA sent letter to Refined Metals which required stack tests to be performed - April 21, 1989. Results were to be submitted to EPA by August 21, 1989.

- Refined Metals conducted stack tests for particulate and lead emissions - June 19, 1989.
- Stack test showed continued non-compliance. EPA prepared to refer the case to the Department of Justice - August 1989.

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- IAPCS and IDEM met to discuss the Refined Metals case - September 1, 1989. A revised Consent Decree was sent to Refined Metals for review.

EPA referred case to the Department of Justice - October 11, 1989.

- IAPCS and IDEM revised the proposed State Consent Decree - October 1989.
- IDEM sent Refined Metals a revised Consent Decree - November 7, 1989.
- Refined Metals responded to revised Consent Decree - December 1989.
- IDEM sent Refined Metals a revised Consent Decree - January 12, 1990.
- Refined Metals responded to IDEM's comments - April 18, 1990.
- Refined Metals and IDEM discussed settlement of the Consent Decree (Agreed Order) - April 24, 1990.
- IDEM responded to Refined Metals comments - May 16, 1990.
- IDEM and Refined Metals met to discuss settlement of State NOV - May 29, 1990.
- EPA referral was submitted to the Department of Justice - July 20, 1990.
- IDEM worked with Refined Metals to reduce emissions through building enclosures - August 1990.
- EPA contractors and IAPCS conducted a surprise inspection of the facility - August 29, 1990.
- Indiana Air Pollution Control Board considered Lead Rule (326 IAC 15-1-2) revision for Refined Metals that decreases the allowable fugitive emission rate and revise the allowable stack emissions - October 3, 1990.
- The U.S. Department of Justice sent a letter to IDEM stating that action was being filed in U.S. District Court against Refined Metals for violations of RCRA, the Indiana Hazardous Waste Management Program, the Clean Air Act, and the Indiana SIP - November 15, 1990.

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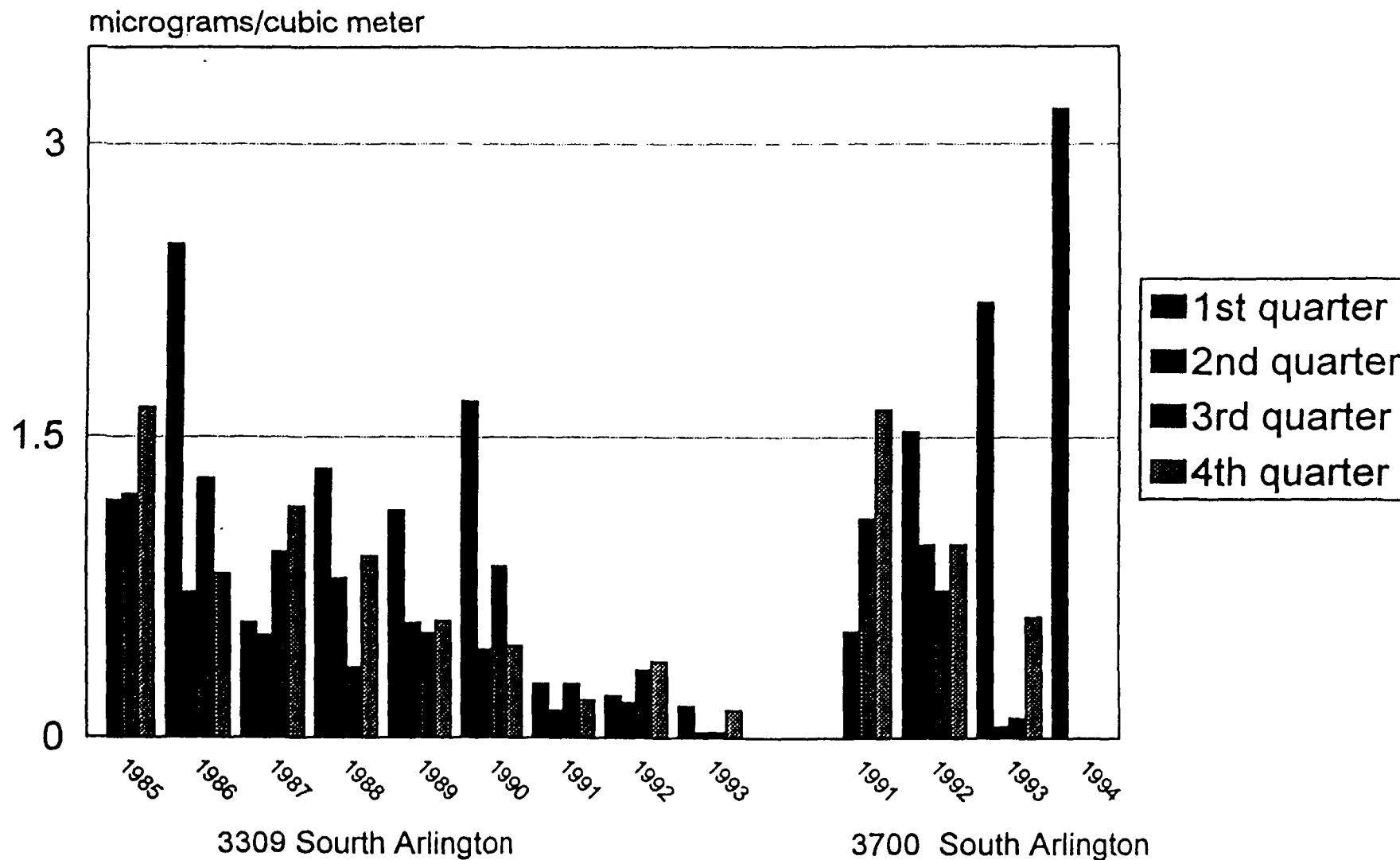
- Negotiations between IDEM and Refined Metals occurred to resolve the violation. IDEM wanted Refined Metals to achieve compliance and complete the total enclosure of the blast furnace by September, but Refined Metals wanted to extend the deadline to December - March 1991.
- IAPCS began operating a second lead monitor at a site adjacent to Refined Metal's property - April 1991.
- Refined Metals and IDEM signed the Agreed Order which included a penalty of \$27,000 - September 25, 1991.
- Refined Metals enclosed the blast furnace area per the IDEM Agreed Order - December 31, 1991.
- A violation of the National Ambient Air Quality Standard (NAAQS) was noted for the fourth quarter of 1991 at the lead monitoring site adjacent to Refined Metals property - February 10, 1992.
- IAPCS conducted a surprise inspection to check records and determined records to be in order - September 23, 1992.
- IAPCS conducted a surprise annual inspection - January 12, 1993.
- IAPCS and IDEM conducted a surprise inspection. Problems were observed with the screw conveyor system. - January 29, 1993.
- Refined Metals ceased operation due to poor lead market conditions - February 1993.
- Refined Metals resumed operation - November 1993.
- IAPCS conducted a surprise annual inspection - January 12, 1994.
- IAPCS conducted a surprise inspection - April 25, 1994.
- IAPCS conducted a surprise inspection - May 2, 1994.
- IDEM finalized Agreed Order with Refined Metals to reduce fugitive lead emissions from the facility - May 20, 1994.
- IAPCS issued letter to Refined Metals to cease operation of the water spray in front of the air monitor operated by IAPCS - May 24, 1994.

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Please find attached a graph of the measured lead readings from our air monitoring sites. If you have any questions, please contact Richard Martin, Assistant Administrator, at 327-2269, or Cheryl Carlson, Enforcement Manager, at 327-2281.

Indianapolis Air Pollution Control Section

Lead monitoring sites near Refined Metals, 3700 S. Arlington Ave.



National Ambient Air Quality Standard = 1.5 micrograms/cubic meter

ATTACHMENT C

6/30/94

ENVIRONMENTAL RESULT-REFINED METALS AREA

ADDRESS	WATER SAMPLE RESULTS	SOIL SAMPLE RESULTS	DUST SAMPLES RESULTS	DATE OF SAMPLES
1414 ARCOLA CT		167		6/07/94
2105 S BOLTON	0	30		6/01/94
2150 S HUNTER	0	13		5/23/94
2150 S HUNTER	0	35		5/23/94
2150 S HUNTER	0	44		5/23/94
2223 S HUNTER		30		6/07/94
2420 S AUBON		78		5/23/94
2521 ANDREWS CT		34		5/23/94
2565 S RITTER	0			6/01/94
2603 S RITTER		79		5/23/94
2610 S RITTER		21		5/09/94
2610 S RITTER		48		5/09/94
2610 S RITTER	0	150		6/01/94
2632 ARLINGTON		53		5/18/94
2632 ARLINGTON		58		5/09/94
2650 S SHERIDAN		48		5/09/94
2715 S KENMORE		36		6/07/94
2725 S KENMORE	0	168		6/02/94
2750 ARLINGTON		40		3/29/94
2750 ARLINGTON		65		3/29/94
2750 S ARLINGTON	0	41		6/02/94
2823 S IRWIN	0	141		6/02/94
2824 S RITTER		90		6/07/94
2961 ARLINGTON		68		4/07/94
2961 ARLINGTON		127		4/07/94
2961 ARLINGTON		399		4/07/94
2961 ARLINGTON		423		4/07/94
330 E CHURCHMAN		109		5/24/94
330 E CHURCHMAN		192		5/24/94
330 E CHURCHMAN		868		5/24/94
3309 S ARLINGTON		134		5/17/94
3309 S ARLINGTON		245		5/17/94
3309 S ARLINGTON		266		5/17/94
3309 S ARLINGTON		294		5/17/94
3309 S ARLINGTON		308		5/17/94
3309 S ARLINGTON		334		5/17/94
3309 S ARLINGTON		357		5/17/94
3309 S ARLINGTON		541		5/17/94
3309 S ARLINGTON		611		5/17/94
3309 S ARLINGTON		634		5/17/94
3309 S ARLINGTON		2060		5/17/94
340 E CHURCHMAN		43		5/24/94
3560 BIG FOUR		2100		6/07/94
3560 BIG FOUR		4020		6/07/94
3560 BIG FOUR		4060		6/07/94
EATON	0	155		6/03/94

6/30/94

ENVIRONMENTAL RESULT-REFINED METALS AREA

ADDRESS	WATER SAMPLE RESULTS	SOIL SAMPLE RESULTS	DUST SAMPLES RESULTS	DATE OF SAMPLES
4459 WINNERS CIRCLE		23		6/07/94
4459 WINNERS CIRCLE		26		6/07/94
449 S MELVENIA		92		6/06/94
4621 CITATION BLVD		29		5/09/94
4621 CITATION BLVD		165		5/09/94
4641 TIM TAM CT		138		5/23/94
4645 TIM TAM CT		26		5/23/94
5149 ELEANOR	0	171		6/02/94
5334 E HORNET		25		5/24/94
5344 SOUTHERN		39		5/04/94
5344 SOUTHERN		40		5/04/94
5474 CHURCHMAN	3	30	260	6/02/94
5528 E SOUTHERN	0	54		6/01/94
5540 E SOUTHERN	0	78		6/01/94
5634 VICTORY	0	46		6/02/94
5703 CHURCHMAN		30		5/04/94
5703 CHURCHMAN		72		5/04/94
5705 CHURCHMAN		32		5/23/94
5715 CHURCHMAN	0	113	50	6/02/94
5800 E TROY		59		4/07/94
5800 E TROY		65		4/07/94
5916 E TROY		142		4/07/94
5916 E TROY		289		4/07/94
5920 E TROY		82		4/07/94
5920 E TROY		112		4/07/94
5920 E TROY		114		4/07/94
5920 E TROY		139		4/07/94
5930 E TROY	0	25		6/02/94
6501 E TROY	0	117	12	6/02/94
6510 E TROY	0	42		6/02/94
6630 E TROY	0	72		6/02/94
6655 SOUTHEASTERN	0	68		6/02/94
6730 E HANNA	0	61		6/03/94
6850 E HANNA	0	94		6/03/94
7110 E PAYNE	0	66		6/03/94
7115 E PAYNE	0	49		6/03/94

06/29/94

11:45

317 541 2167

MEADOWS

004

6/29/94

BLOOD RESULTS

non-responsive



6/29/94

BLOOD RESULTS

non-responsive

08/29/94

11:45

317 541 2167

MEADOWS

008

6/29/94

BLOOD RESULTS

non-responsive

SO₂ - Site 27
3309 South Arlington

Date	1st High Hourly Avg. ppb	2nd High Hourly Avg. ppb	24 Hour Avg. ppb	Resultant Wind Direction Degrees	Wind Speed MPH
6/14/94	100	68	31*	195	7
6/15/94	63	45	12	204	7
6/16/94	1	1	1	211	5
6/17/94	3	2	1	60	5
6/18/94	28	14	5	54	4
6/19/94	11	10	2	141	3
6/20/94	49	41	9	255	4
6/21/94	38	22	5	277	4
6/22/94	3	1	1	294	3
6/23/94	23	17	5	203	3
6/24/94	33	20	6	216	2
6/25/94	17	14	6	257	5
6/26/94	8	7	2	144	2
6/27/94	1	1	1	357	2
6/28/94	83	56	22	218	6
6/29/94	32	27	9	263	5
6/30/94	2	1	1	329	3
7/1/94	95	78	22	200	6
7/2/94	144	63	20	203	4
7/3/94	8	7	3	118	5
7/4/94	6	5	3	172	7
7/5/94	10	6	3	208	5
7/6/94	29	20	6	169	5

SO₂ - Site 27

3309 South Arlington

Date	1st High Hourly Avg. ppb	2nd High Hourly Avg. ppb	24 Hour Avg. ppb	Resultant Wind Direction Degrees	Wind Speed MPH
7/7/94	6	4	2	173	7
7/8/94	71	60	12	198	8
7/9/94	40	29	5	250	7
7/10/94	3	2	1	355	5
7/11/94	3	3	2	168	3
7/12/94	38	30	7	182	3
7/13/94	4	3	1	114	4
7/14/94	62	36	17	215	5
7/15/94	14	13	4	313	5
7/16/94	2	1	1	120	3
7/17/94	31	28	7	260	5
7/18/94	4	3	1	312	3
7/19/94	17	12	5	188	5
7/20/94	21	15	8	198	6
7/21/94	28	18	7	211	5
7/22/94	104	104	24	248	5
7/23/94	32	20	10	263	4
7/24/94	28	18	7	248	4
7/25/94	36	27	8	292	4
7/26/94	37	13	1	294	5
7/27/94	10	1	1	327	4
7/28/94	4	2	2	345	3
7/29/94	1	1	1	6	3
7/30/94	78	61	12	209	3
7/31/94	11	11	5	191	3

* 11 hour average - Analyzer start up mid-day.

Lead Data 1st Qtr. 1994
Refined Metals Area

<u>Date</u>	Site ₂₇ <u>ug/m³</u>	Site ₂₈ <u>ug/m</u>	Resultant Wind Degrees <u>Direction</u>	Average Wind Speed <u>MPH</u>
1/2	0.065	0.229	60	1
1/8	0.010	2.615	265	1
1/14	0.037	0.866	302	6
1/20	0.604	0.357	122	4
1/26	0.012	0.087	65	7
2/1	0.086	12.260	246	6
2/7	0.077	2.675	51	8
2/13	0.033	----	284	8
2/19	0.065	0.365	171	9
2/23	0.192	-----	269	7
2/25	0.190	6.017	224	11
3/1	0.022	0.096	66	8
3/3	0.065	3.852	286	6
3/6	0.367	7.000	230	6
3/9	0.031	0.752	39	8
3/12	0.343	0.753	188	7
3/15	0.132	7.307	306	10
3/21	0.280	0.937	266	8
3/24	0.287	10.608	284	9
3/27	0.041	0.141	337	2
3/30	0.954	3.477	287	5
QTR.				
AVG.	0.185	3.18		

Note: National Ambient Air Quality Standard for lead is 1.5 ug/m³ or a quarterly average.

Lead Data 2nd Qtr. 1994
Refined Metals Area

Date	Site ₂₇	Site ₂₈	Resultant	Average
<u>Date</u>	<u>ug/m³</u>	<u>ug/m³</u>	<u>Wind Direction</u>	<u>Wind Speed</u>
			<u>Degrees</u>	<u>MPH</u>
4/2	2.231	24.49*	221	8
4/5	0.349	0.279	200	4
4/8	0.112	0.406	146	9
4/14	0.754	4.062	198	8
4/20	0.882	0.831	348	6
4/23	0.094	0.339	152	7
4/26	1.971	-----	200	10
4/27	-----	5.01	294	5
5/2	0.082	0.854	149	8
5/8	0.113	0.479	236	3
5/11	2.825	1.582	221	9
5/14	0.051	0.255	144	7
5/17	0.026	0.158	16	5
5/20	0.053	0.286	48	6
5/21	0.210	2.089	323	7
5/29	0.155	0.154	187	8
6/1	0.064	0.493	340	6
6/4	0.130	-----	216	6
6/7	0.077	0.305	68	5
6/13	1.057	0.459	205	6
6/16	0.059	0.188	211	5
6/19	0.109	0.296	141	3
6/22	0.130	0.468	294	3
6/25	0.076	1.963	257	5
6/28	0.504	1.285	218	6
Qtr.				
Avg.	0.505	2.030		

* TSP concentration was 107 ug/m³ (sample was 23% lead).

Note: National Ambient Air Quality Standard for lead is 1.5 ug/m³ for a quarterly average.

ODOR COMPLAINTS AT REFINED METALS

COMPLAINT DATE/TIME	COMPLAINANT	CHARACTERISTICS OF ODOR	WIND SPEED & DIRECTION	INSPECTORS REPORT	INSPECTOR
12/06/93 @ 2:18 pm	Robert Woodard 5420 Armstrong Dr.	odor	12 mph west	no odor from source	BKS
12/20/93 @ 9:20 am	Anonymous	odor always on weekends	N/A	strong odor of burning rubber	BKS
12/20/93 @ 2:32 pm	Mary Davis 2750 S. Arlington Ave.	bad odor	N/A	strong odor of burning rubber and plastic	BKS
12/20/93 @ 4:30 pm	Ralph Vanderbahn 2859 Pasadena St.	very bad odor	N/A	no odor detected	TEW
02/12/94 @ 6:00 pm	Kathy Howard 3309 S. Arlington Ave.	very strong burning plastic odor	5 mph southwest	explained that there are no laws concerning odor	TEW
02/14/94 @ 9:50 am	Kathy Howard 3309 S. Arlington Ave.	very strong odor	7 mph southwest	no odor detected; no visible emissions	CLS
02/14/94 @ 11:08 am	Chris Betrand 2715 S. Kenmore	bad odor at 7:30 pm on 02/13/94	8 mph southwest	informed that you must call at time of detection	CLS
02/19/94 @ 1:36 pm	Mary Davis 2750 S. Arlington Ave.	very strong acid odor	15 mph south	no odor detected	TNG
03/12/94 @ 1:21 pm	Mary Davis 2750 S. Arlington Ave.	moderate burnt rubber and plastic odor	11 mph southwest	moderate odor from the north of the plant	JSH
03/14/94 @ 4:41 pm	Kathy Howard 3700 S. Arlington Ave.	burnt rubber and sulfur odor	11 mph southwest	slight odor north of the plant; no visible emissions	JSH
03/16/94 @ 5:47 pm	Mary Davis 2750 S. Arlington Ave.	moderate burnt rubber odor	14 mph northwest	no odor detected	JSH
04/02/94 @ 1:45 pm	Mike Matthews	strong odor and black smoke	11 mph southwest	no odors detected; some cells in the M-2BH had burned	BKS
04/06/94 @ 10:11 am	Sara Franke 6501 E. Troy Ave.	very strong odor	calm variable	no odor detected	BKS
04/08/94 @ 10:00 am	Eileen Brown 4641 Tim Tam Circle	odor	13 mph southeast	no odor detected	BKS
04/19/94 @ 10:40 am	Debbie Sachse 4645 Tim Tam Circle	very strong odor	8 mph north	strong odor southeast of the plant	BKS
04/20/94 @ 9:50 am	Mary Hartley 4808 Candy Spots Dr.	bad odor, smells like battery acid	6 mph north	left her a glass slide for sampling	KEH
04/20/94 @ 10:34 am	Eileen Brown 4641 Tim Tam Circle	bad odor	6 mph north	odor detected	KEH

ATTACHMENT D

04/24/94 @ 5:00 pm	Kathy Howard 3700 S. Arlington Ave.	strong burning plastic or chemical odor	10 mph southwest	odor of burned plastic and diesel fuel (chemical odor)	TEW
04/25/94 @ 10:30 am	Ralph Vanderbahn 2859 S. Pasadena St.	bad odor	11 mph southwest	no visible emissions; moderate odor at the plant and slight odor at the complainant's residence	JSH
04/25/94 @ 4:29 pm	Mary Davis 2750 S. Arlington Ave.	odor	14 mph southwest	normal odor detected	KEH
04/26/94 @ 9:29 am	Kathy Howard 3700 S. Arlington Ave.	bad odor	11 mph south	no odor detected	BKS
04/26/94 @ 4:45 pm	Kathy Howard 3309 S. Arlington Ave.	odor	17 mph south	detected some odor	KEH
05/01/94 @ 1:30 pm	Bertha Living 6327 E. Hanna	rubber smell	5 mph northwest	slight odor like hot rubber	DOR
05/02/94 @ 8:40 am	Dave Laker Wavetek	odor	6 mph southwest	strong odor from plant	BKS
05/02/94 @ 8:50 am	Pat Corsi 6111 Churchman Bypass	odor	6 mph southwest	strong odor from plant	BKS
05/08/94 @ 10:02 am	Mary Davis 2750 S. Arlington Ave.	sulfur smell	5 mph variable	moderate odor at fence line of plant and slight odor at complainant's residence	JSH
05/08/94 @ 2:15 pm	Kathy Howard 3309 S. Arlington Ave.	strong sulfur smell	5 mph variable	moderate odor at fence line of plant and slight odor at complainant's residence	JSH
05/10/94 @ 10:25 am	Jim Huser 5827 Churchman Ave.	very strong odor since 05/05/94	7 mph north	strong odor south of plant and moderate odor at complainant's residence	JSH
05/10/94 @ 10:30 am	Mikki and Eric Barnes 4310 Arlington Circle	getting sick from odor, sent home by Wavetek	7 mph north	strong odor south of plant and moderate odor at complainant's residence	JSH
05/10/94 @ 10:56 am	Mrs. Eric Garcia	bad odor on 05/09/94	5 mph southwest	strong odor on plant	BKS
05/10/94 @ 11:05 am	Patricia Hall 4823 Candy Spots Dr.	plastic or rubber smell from the northwest	7 mph north	strong odor south of plant and slight odor at complainant's residence	JSH
05/10/94 @ 11:46 am	Eileen Brown 4641 Tim Tam Circle	very strong odor	7 mph north	strong odor south of plant and slight odor at complainant's residence	JSH
05/10/94 @ 11:50 am	Debbie Sachse 4645 Tim Tam Circle	odor	7 mph north	strong odor south of plant and slight odor at complainant's residence	JSH
05/10/94 @ 2:37 pm	Barb Garcell	bad odor	7 mph north	strong odor south of plant and slight odor at complainant's residence	JSH
05/11/94 @ 11:52 am	Arthur Rump 2948 S. Kenmore	strong odor	13 mph southwest	strong odor on plant	BKS
05/12/94 @ 9:38 am	Max Elliott 3901 S. Arlington Ave.	odor	5 mph northwest	strong odor from source	BKS

Eric Brown 5705 Churchman Ave.	moderate smelting odor	8 mph north	odor detected in area
Paula Boone 5475 Churchman Ave.	plastic burning smell	6 mph northeast	slight odor
Mrs. Nichols 4055 Hickory Trail	bad odor	5 mph north	no odor detected
Anonymous	strong odor	5 mph north	no odor detected
Mary Hartley 4808 Candy Spots Dr.	bad odor	6 mph north	reported on continued progress of source
Eric Brown 5705 Churchman Ave.	very strong odor	7 mph northeast	strong odor
Paula Boone 5475 Churchman Ave.	odor	6 mph north	informed of a problem at the plant
Mr. Smith 5701 Churchman Ave.	odor	5 mph northeast	strong odor
Bruce Godshaw 4384 Arlington Circle	odor	6 mph west	no odor detected
Kathy Howard 3309 S. Arlington Ave.	odor	7 mph west	no visible emissions; moderate odor east of plant
Ralph Vanderbahn 2857 S. Pasadena St.	strong odor	4 mph southwest	not investigated; called complainant next d report progress
Linda Howell 225 S. Fifth St.	odor and emissions	9 mph northwest	moderate odor east of plant
Ralph Vanderbahn 2859 S. Pasadena St.	bad odor	6 mph southwest	slight odor, from Firestone Building Produ east of plant
David Sicking 6302 Churchman Bypass	bad odor	6 mph west	not investigated; called complainant next d report progress
Charles	bad odor	7 mph north	walk-thru inspection performed, results of are in report
Barb Godshaw 4384 Arlington Circle	strong odor	9 mph northwest	slight acidic-sulfur odor south of plant
Larry Flynn 2961 S. Arlington Ave.	odor	9 mph southwest	no visible emissions and no odor; blast fur shut down for maintenance
Mary Davis 2750 S. Arlington Ave.	odor	9 mph southwest	no visible emissions and no odor; blast fur shut down for maintenance
Mr. Fishburn 2940 S. Arlington Ave.	odor	7 mph south	acidic-sulfur odor north of the plant; slight at the complainant's residence

05/12/94 @ 1:15 pm	Mary Hartley 4808 Candy Spots Dr.	very strong odor	7 mph northwest	strong odor south of plant	BKS
05/12/94 @ 4:13 pm	Tom Jones 4620 Citation	bad odor	6 mph northwest	moderate odor south of plant and slight odor at complainant's residence	JSH
05/12/94 @ 6:43 pm	Meg Swhear 5532 Riva Ridge Dr.	moderate burnt plastic odor	6 mph northwest	moderate odor south of plant and slight odor at complainant's residence	JSH
05/16/94 @ 12:45 pm	Anonymous Arlington Commons	odor	10 mph northwest	no visible emissions at location; moderate odor southeast of plant	JSH
05/16/94 @ 10:35 pm	Dwayne Rice 4325 S. Luke	rubber burning smell	8 mph northwest	explained Agreed Judgement and progressive status of the source	BKS
05/16/94 @ 10:35 pm	Ron Deetar 4459 Winners Circle	burning plastic odor	8 mph northwest	explained Agreed Judgement and progressive status of the source	BKS
05/17/94 @ 11:46 am	Debbie Sachae 4645 Tim Tam Circle	odor	7 mph north	strong metallic odor southwest of plant; no odor at 2:30 pm	JAB/BKS
05/17/94 @ 11:53 am	Eileen Brown 4641 Tim Tam Circle	odor	7 mph north	strong metallic odor southwest of plant; no odor at 2:30 pm	JAB/BKS
05/17/94 @ 11:54 am	Anabell Cook 5731 Churchman Ave.	odor	7 mph north	strong metallic odor southwest of plant; no odor at 2:30 pm	JAB/BKS
05/17/94 @ 11:57 am	Diana Brewer 5601 Riva Ridge Dr.	odor	7 mph north	strong metallic odor southwest of plant; no odor at 2:30 pm	JAB/BKS
05/17/94 @ 4:20 pm	Dave Laker Wavetek	moderate smelting odor	8 mph northeast	no visible emissions; faint odor on Thompson Rd.	TNG
05/17/94 @ 4:25 pm	Eric Brown 5705 Churchman Ave.	moderate smelting odor	8 mph northeast	burnt acid odor at residence and plant; no visible emissions	TNG
05/17/94 @ 6:53 pm	Shelly Pfeiffer 5538 Riva Ridge Dr.	moderate smelting odor	6 mph north	faint burnt acid odor at residence and plant; no visible emissions	TNG
05/18/94	Mary Hartley 4808 Candy Spots Dr.	bad odor	5 mph north	strong odor from source	BKS
05/18/94 @ 2:10 pm	Mikki Barnes 4310 Arlington Circle	bad odor	8 mph north	explained IDEM to complainant	BKS
05/18/94 @ 3:50 pm	David Quire 5916 E. Troy Ave.	odor on 5/16/94	9 mph north	explained progress of source	BKS
05/18/94 @ 4:05 pm	David Quire 5916 E. Troy Ave.	bad odor in past; no odor currently	11 mph north	explained current inspection of the facility	CLC
05/18/94 @ 5:41 pm	Diane Brewer 5601 Riva Ridge Dr.	wanted to know about future stoppage of odor	10 mph north	odor was detected on the plant on 05/19/94	BKS
05/18/94 @ 9:09 pm	Larry Flynn 2961 S. Arlington Ave.	odor	8 mph northeast	reported progress of RM	BKS

05/30/94 @ 9:16 am	Larry Flynn 2961 S. Arlington Ave.	odor	7 mph south	acidic-sulfur odor north of the plant; slight odor at the complainant's residence	JSH
05/30/94 @ 9:16 am	Robert Clark 2750 S. Sheridan	odor	7 mph south	acidic-sulfur odor north of the plant; slight odor at the complainant's residence	JSH
05/30/94 @ 9:16 am	Terry Puckett 6121 E. Southern Ave.	odor	7 mph south	acidic-sulfur odor north of the plant; slight odor at the complainant's residence	JSH
05/30/94 @ 9:16 am	Dick Marshall 6114 Southern Ave.	odor	7 mph south	acidic-sulfur odor north of the plant; slight odor at the complainant's residence	JSH
05/30/94 @ 9:16 am	Linda Thatcher 5930 E. Troy Ave.	odor	7 mph south	acidic-sulfur odor north of the plant; slight odor at the complainant's residence	JSH
05/30/94 @ 9:16 am	Roger Rebenock 5950 E. Troy Ave.	odor	7 mph south	acidic-sulfur odor north of the plant; slight odor at the complainant's residence	JSH
05/30/94 @ 9:43 am	Jan Cline 5920 E. Troy Ave.	strong odor	8 mph south	no visible emissions; strong acidic-sulfur odor from the plant; strong odor at complainant's	JSH
05/30/94 @ 2:44 pm	Susan Bremnan 2653 S. Ritter	odor	11 mph south	acidic-sulfur odor north of the plant; slight odor at the complainant's residence	JSH
05/30/94 @ 2:44 pm	Doris Ellington 5528 E. Southern	odor	11 mph south	could not get in contact with complainant	BKS
05/30/94 @ 6:39 pm	Mary Davis 2750 S. Arlington Ave.	strong odor	10 mph south	strong acidic-sulfur odor at plant; moderate odor at complainant's residence	JSH
05/30/94 @ 7:48 pm	Kathy Howard 3309 S. Arlington Ave.	strong odor	9 mph south	no visible emissions; strong acidic-sulfur odor from the plant; strong odor at complainant's	JSH
05/31/94 @ 6:33 am	Mary Davis 2750 S. Arlington Ave.	bad odor; trouble breathing	7 mph southwest	moderate odor detected north and east of the plant	JSH
05/31/94 @ 6:38 am	Jan Cline 5920 E. Troy Ave.	bad odor; trouble breathing	7 mph southwest	moderate odor detected north and east of the plant	JSH
05/31/94 @ 6:49 am	Mildred Davis 2826 S. Arlington Ave.	bad odor; trouble breathing	7 mph southwest	moderate odor detected north and east of the plant	JSH
05/31/94 @ 8:05 am	Neda Beals 2800 S. 6300 E.	strong pungent odor	7 mph southwest	odor was detected east of source	JSH
05/31/94 @ 10:26 am	Kay Rose 2944 S. Kitley	bad odor	11 mph southwest	moderate odor detected north and east of plant	JSH
06/01/94 @ 5:31 pm	Anonymous Farhill Downs Addition	strong odor	8 mph north	strong odor south of plant; odor due to a crack in the slog pot	JSH
06/01/94 @ 6:27 pm	Mikki Barnes 4310 S. Arlington Ave.	strong odor	7 mph north	strong odor south of plant; moderate odor at the complainant's residence; due to crack in slog pot	JSH
06/01/94 @ 6:31 pm	Bruce Godshaw 4384 Arlington Circle	strong odor	7 mph north	strong odor south of plant; moderate odor at the complainant's residence; due to crack in slog pot	JSH

06/01/94 @ 6:33 pm	Charlotte Goff 4812 Candy Spots Dr.	strong odor	7 mph north	strong odor south of plant; moderate odor at the complainant's residence; due to crack in slog pot	JSH
06/01/94 @ 6:40 pm	Mary Hartley 4808 Candy Spots Dr.	strong odor	7 mph north	strong odor south of plant; moderate odor at the complainant's residence; due to crack in slog pot	JSH
06/02/94 @ 9:50 am	Robert Woodward 5420 Armstrong Dr.	strong odor coming from the north	7 mph northeast	inspection in progress at plant; explained what had been going on at the plant	JSH
06/02/94 @ 10:34 pm	Meg Swhear 5532 Riva Ridge Dr.	strong burnt plastic and rubber odor	3 mph north	moderate odor south of plant; slight odor at complainant's residence; briefed complainant	JSH
06/04/94 @ 8:23 am	Roger Rebennoch 5950 E. Troy Ave.	burning rubber odor	6 mph variable	no visible emissions observed; moderate odor detected east of plant; briefed complainant	JSH
06/04/94 @ 8:37 am	Doris Ellington 5528 E. Southern	burnt plastic and rubber odor	6 mph variable	no visible emissions observed; moderate odor detected east of plant; briefed complainant	JSH
06/04/94 @ 9:28 am	Mrs. Bostic 6730 E. Hanna	burnt plastic and rubber odor	6 mph variable	no visible emissions observed; moderate odor detected east of plant; briefed complainant	JSH
06/04/94 @ 10:52 pm	Mrs. Rankhe 2926 S. Pasadena St.	burnt plastic and rubber odor	6 mph southwest	moderate odor east of plant; briefed complainant	JSH
06/04/94 @ 1:43 pm	Kathy Howard 3209 S. Arlington Ave.	burnt plastic and rubber odor	6 mph southwest	no visible emissions detected; moderate odor east of plant; briefed complainant	JSH
06/04/94 @ 4:36 pm	Kathy Howard 3209 S. Arlington Ave.	strong acidic-sulfur odor	6 mph southwest	called complainant	JSH
06/05/94 @ 8:24 am	Mary Davis 2750 S. Arlington Ave.	strong odor	6 mph south	reported to plant; briefed complainant	JSH
06/05/94 @ 9:59 am	Roger Rebennoch 5950 E. Troy Ave.	bad burning rubber odor	8 mph south	briefed complainant	JSH
06/05/94 @ 10:39 am	Jim Vauter 6408 E. Berwyn	burnt rubber odor	8 mph south	briefed complainant	JSH
06/05/94 @ 10:58 am	Mildred Davis 2826 S. Arlington Ave.	strong burnt rubber odor	8 mph south	briefed complainant	JSH
06/05/94 @ 2:02 pm	Kathy Howard 3209 S. Arlington Ave.	strong burnt rubber and plastic odor	10 mph southwest	no visible emissions detected; moderate odor north of plant; briefed complainant	JSH
06/05/94 @ 7:38 pm	Mildred Davis 2826 S. Arlington Ave.	burnt rubber and plastic odor	7 mph south	briefed complainant	JSH
06/06/94 @ 9:01 pm	Kathy Howard 3309 S. Arlington Ave.	strong odor	2 mph southwest	briefed complainant	JSH
06/12/94 @ 5:36 pm	Mary Davis 2750 S. Arlington Ave.	strong burnt plastic and rubber odor	1 mph variable	no visible emissions detected; moderate odor north of plant; briefed complainant	JSH
06/12/94 @ 5:41 pm	Larry Flynn 2961 S. Arlington Ave.	bad odor	1 mph variable	no visible emissions detected; moderate odor north of plant	JSH

06/12/94 @ 5:42 pm	Roger Rebennoch 5950 E. Troy Ave.	bad odor	1 mph variable	no visible emissions detected; moderate odor north of plant; briefed complainant	JSH
06/12/94 @ 5:43 pm	Earl Fishburn 2940 S. Arlington Ave.	bad burnt plastic and rubber odor	1 mph variable	no visible emissions detected; moderate odor north of plant; briefed complainant	JSH
06/12/94 @ 6:23 pm	Kathy Howard 3309 S. Arlington Ave.	bad odor	1 mph variable	no visible emissions detected; moderate odor north of plant; briefed complainant	JSH
06/12/94 @ 6:25 pm	Terry Puckett 6121 E. Southern Ave.	bad odor	1 mph variable	no visible emissions detected; moderate odor north of plant; briefed complainant	JSH
06/12/94 @ 8:23 pm	Martha Brennan 2653 S. Ritter	bad burnt rubber and plastic odor	1 mph north	no visible emissions detected; moderate odor north of plant; briefed complainant	JSH
06/13/94 @ 8:34 am	Mildred Davis 2826 S. Arlington Ave.	very bad odor	10 mph southwest	mild odor east of the plant; strong burnt rubber odor north of plant; spoke with complainant	BKS
06/13/94 @ 10:30 am	Maria Flynn 2961 S. Arlington Ave.	strong acid odor	10 mph southwest	very strong odor of burning rubber north of plant	BKS
06/13/94 @ 10:30 am	David Quire 5916 E. Troy Ave.	very strong metallic, burning rubber odor	10 mph southwest	very strong odor of burnt rubber detected north of plant	BKS
06/13/94 @ 6:01 pm	James Vauter 6408 E. Berwyn	bad odor	10 mph southwest	no visible emissions; moderate odor north of plant; briefed complainant	JSH
06/13/94 @ 8:40 pm	Mary Davis 2750 S. Arlington Ave.	bad burnt rubber and plastic odor	7 mph south	no visible emissions; moderate odor north of plant; slight odor at complainant's residence	JSH
06/13/94 @ 9:58 pm	Jan Cline 5920 E. Troy Ave.	bad burnt plastic and rubber odor	7 mph south	briefed complainant	JSH
06/13/94 @ 10:01 pm	Debbie Shaw 5830 E. Troy Ave.	bad odor	5 mph south	briefed complainant	JSH
06/14/94 @ 12:56 pm	Mary Davis 2750 S. Arlington Ave.		11 mph south	no visible emissions; moderate odor north of plant; briefed complainant	JSH
06/14/94 @ 4:14 pm	Roger Rebennoch 5950 E. Troy Ave.	bad odor	11 mph south	could not contact complainant	GLM
06/14/94 @ 5:23 pm	Jim Vauter 6408 E. Berwyn	sweet rubber burning smell out of the SW	10 mph south	briefed complainant	GLM
06/15/94 @ 7:29 am	Kelly Woodard 2939 S. Sheridan	bad odor	7 mph south	strong sulfuric acid odor south of plant; briefed complainant	BKS
06/15/94 @ 1:00 pm	Bob Burnett		10 mph south	briefed complainant	BKS
06/15/94 @ 6:50 pm	Ralph Vanderbahn 2859 S. Pasadena St.	bad sulfur odor	6 mph southwest	no visible emissions; moderate odor at plant; slight odor at residence; briefed complainant	JSH
06/16/94 @ 8:45 am	Diana Brewer 5601 Riva Ridge Dr.	odor	5 mph north	strong odor detected south of plant; briefed complainant	BKS

06/16/94 @ 6:18 pm	Terry Puckett 6121 E. Southern	strong odor	5 mph southwest	no visible emissions; moderate odor north of plant; slight odor at residence; briefing	JSH
06/17/94 @ 1:23 pm	Victor Mascari 5417 Adelaide	bad odor	7 mph east	briefed complainant	JSH
06/18/94 @ 4:59 pm	Mary Hartley 4808 Candy Spots Dr.	bad odor	5 mph variable	moderate odor south of plant; very slight odor at complainant's residence; briefed complainant	JSH
06/22/94 @ 7:30 am	Mary Hartley 4808 Candy Spots Dr.	very bad odor	2 mph north	strong odor south of plant; faint odor of sulfuric acid at residence, but strong asphalt odor	BKS
06/25/94 @ 9:53 am	Mary Davis 2750 S. Arlington Ave.	bad burnt rubber and plastic odor	8 mph northwest	no visible emissions; moderate odor east of plant; no odor detected at residence; briefing	JSH
06/26/94 @ 1:51 pm	Roger Rebenock 5950 E. Troy Ave.	odor	3 mph southeast	no visible emissions; moderate odor north of plant; slight odor at residence; briefing	JSH
06/27/94 @ 4:05 pm	Eileen Brown 4641 Tim Tam Circle	bad odor	6 mph north	no visible emissions; slight odor southwest of plant; no odor at residence	JSH
06/28/94 @ 6:32 am	Mary Davis 2750 S. Arlington Ave.	sulfuric acid and burnt plastic odor	6 mph south	strong odor detected on plant; strong sulfuric acid odor on complainant's residence	BKS
06/28/94 @ 8:00 am	Wilbur Meyer 2303 S. Sheridan	very strong odor	6 mph south	strong sulfuric acid odor on plant and at residence; briefed complainant	BKS
06/28/94 @ 8:00 am	Mildred Davis 2826 S. Arlington Ave.	bad odor	6 mph south	strong odor detected on plant and on residence; briefed complainant	BKS
06/28/94 @ 3:07 pm	Faith Lyons 3305 S. Arlington Ave.	bad odor	9 mph south	no visible emissions; strong sulfuric acid odor north of plant; briefed complainant	BKS
06/29/94 @ 2:10 pm	David Quire 5916 E. Troy	odor making him sick with headache & nausea	8 mph west	Inspection conducted on 6/30/94 and nothing unusual was noted.	BKS
06/30/94 @ 9:05 am	Dave Laker Wavetek	strong sulphur odor in the area	5 mph north	odor detected southwest of the sources and at the complainants location.	JAB
07/01/94 @ 7:00 am	Mildred Davis 2826 S. Arlington Ave.	odor began about one hour ago and getting worse	6 mph Southwest	Inspection of plant conducted at 8:21 am until 9:31 am and no unusual activity was observed. Stopped by complainant's house, but no one home.	BKS
07/01/94 @ 7:18 am	Mary Davis 2750 S. Arlington Ave.	strong odor; wants to know if they are burning plant scrap	6 mph Southwest	Inspection of plant conducted at 8:21 am until 9:31 am and no unusual activity was observed. Briefed complainant.	BKS
07/01/94 @ 10:03 am	Mary Hartley 4808 Candy Spots Dr.	white cloud and bubbling on the roof	8 mph Southwest	white cloud is the condensate from the cooling box for the furnace.	BKS
07/01/94 @ 11:54 am	Terry Puckett 6121 E. Southern Ave.	bad odor causing a severe headache	9 mph Southwest	Inspection of plant conducted at 8:21 am until 9:31 am and no unusual activity was observed. An odor was detected in the area of Troy and Churchman.	BKS

07/01/94 @ 10:10 pm	Mary Davis 2750 S. Arlington Ave.	bad odor; running her personal pump from the Marion County Health Department	5 mph South	Complainant called to advise that the odor was ban and that she was running her personal air pump from the Marion County Health Department.	JSH
07/02/94 @ 5:38 pm	Karen Schneider 5525 Whirlaway Lane	very strong burning odor	1 mph North	moderate odor detected south of the plant, but no visible emissions. Blast furnace was in operation. Went to complainant's house and detected a slight odor.	JSH
07/02/94 @ 5:52 pm	DeWayne Rice 4325 Lucky Court	very strong odor	1 mph North	moderate odor detected south of the plant, but no visible emissions. Blast furnace was in operation. Went to complainant's house and detected a slight odor.	JSH
07/06/94 @ 1:50 pm	Mrs. Kenneth McGhee 75 S. 5th St. Beech Grove	odor makes her laundry smell when hung on line to dry. Bad odor today.	5 mph Southwest	slight odor detected at plant property line. No odor detected at complainant's house. Complainant not at home. Briefed complainant on 07/07/94.	BKS
07/08/94 @ 7:02 pm	Mary Davis 2750 S. Arlington Ave.	smoke from stacks and odor	8 mph South	5-10 % opacity observed from the kettle burner combustion stack and slight odor. Blast furnace was no on-line. Briefed complainant at her house.	JSH
07/08/94 @ 7:07 pm	Kathy Howard 3309 S. Arlington Ave.	smoke from stacks and odor	8 mph South	5-10 % opacity observed from the kettle burner combustion stack and slight odor. Blast furnace was no on-line. Briefed complainant at her house.	JSH
07/10/94 @ 6:30 pm	Charlotte Goff 4812 Candy Spots Lane	offensive odor	6 mph Northwest	moderate odor detected at plant property line. Slight odor detected at complainant's house. Briefed complainant.	JSH
07/10/94 @ 6:31 pm	Diana Brewer 5601 Riva Ridge Dr.	"fire-cracker" odor	6 mph Northwest	moderate odor detected at plant property line. No odor detected at complainant's house. Briefed complainant.	JSH
07/10/94 @ 7:01 pm	Shelly Pfeiffer 5538 Riva Ridge Dr.	burnt rubber/plastic odor	5 mph North	moderate odor detected at plant property line. No odor detected at complainant's house. Briefed complainant.	JSH
07/10/94 @ 10:15 pm	Ron Deetar 4459 Winners Circle	"fire-cracker" odor	4 mph North	no visible emissions from the stacks and a moderate odor on the south property line of the plant.	JSH
07/11/94 @ 10:41 am	Pat Kreuzman 6511 Churchman Ave.	bad odor Sunday (07/10/94) about 3:00 pm	5 mph North (07/10/94)	strong odor detected southwest of the plant on 07/11/94 at 12:00 pm.	BKS
07/14/94 @ 8:29 am	Bea Lyons 3305 S. Arlington Ave.	banging pipes earlier, now a bad odor.	5 mph Southwest	Inspection of plant revealed that the "banging" was preventative maintenance on the M-1 baghouse cooling vanes. Briefed complainant.	BKS

07/16/94 @ 6:42 pm	Ron Deetar 3651 E. Raymond St.	noted odor at Sherman Ave. and Raymond St.	5 mph Southeast	No visible emissions observed and plant reported that no processing was occurring. Slight odor was detected northwest of the plant. No odor was detected at the complainant's location. Briefed complainant.	JSH
07/17/94 @ 9:18 am	Mary Davis 2750 S. Arlington Ave.	burnt rubber/plastic odor	5 mph Southwest	No visible emissions observed and a moderate odor was detected north and northeast of the plant. Slight odor detected at complainant's house. Briefed complainant.	JSH
07/18/94 @ 8:03 am	Diana Brewer 5601 Riva Ridge Dr.	very bad odor	4 mph Northwest	Odor was detected while at the plant. No odor was detected at the complainant's house. Briefed complainant.	BKS
7/18/94 @ 10:53 am	Jane McAlhane 6519 Hickory Court	odor	5 mph Northwest	Odor was detected while at the plant. Briefed complainant.	BKS
7/18/94 @ 6:22 pm	Ron Deetar 4459 Winners Circle	strong "fire cracker" odor	4 mph West	No visible emissions observed and a slight odor was detected southeast of the plant. No odor detected at complainant's house. Briefed complainant.	JSH
07/19/94 @ 10:50 am	Mildred Davis 2826 S. Arlington Ave.	odor	10 mph Northwest	Inspection of the facility occurred at same time as complaint. Strong odor detected at the plant. Briefed complainant.	BKS
07/21/94 @ 8:06 am	Mildred Davis 2826 S. Arlington Ave.	odor	6 mph South	Odor was detected up to a 1/4 mile north of the plant. Brief complainant.	BKS
07/21/94 @ 11:22 am	Kathy Howard 3309 S. Arlington Ave.	odor	7 mph South	Summa polished canister ready to be picked up.	JSH
07/21/94 @ 5:17 pm	Terry Puckett 6121 E. Southern	strong odor	8 mph Southwest	No visible emissions observed from plant and a moderate odor was detected northeast of the plant. Slight odor was detected at complainant's house.	JSH
07/22/94 @ 7:16 am	Louis Wambagana 6311 E. Troy Ave.	bad burnt plastic odor	6 mph South	Slight paint odor immediately south of the plant. Strong odor north of the plant. Briefed complainant.	BKS
07/25/94 @ 9:11 am	Dave Laker Wavetek	odor	3 mph Northwest	No odor detected south of the plant (Wavetek's parking lot). Strong odor was detected north of the plant.	BKS
07/27/94 @ 7:30 am	Diane Brewer 5601 Riva Ridge Dr.	burning rubber odor; burning complainant's eyes	4 mph West	Slight odor south of the plant. Briefed complainant.	BKS
07/27/94 @ 8:07 am	unknown Arlington Commons	strong odor	3 mph West	Slight odor south of the plant.	BKS
07/27/94 @ 9:10 am	Mary Hartley 4808 Candy Spots Dr.	extremely strong odor since 7:00 am	2 mph West	Slight odor south of the plant. Briefed complainant.	BKS

07/27/94 @ 3:50 pm	Mary Hartley 4808 Candy Spots Dr.	bad odor	8 mph Northwest	No visible emissions from the plant and moderate odor detected immediately south of the plant. Slight odor detected at the complainant's house. Briefed complainant.	JSH
07/27/94 @ 6:56 pm	Ron Deetar 4459 Winners Circle	bad odor noted as he drove by plant	6 mph Northwest	No visible emissions from the plant and moderate odor detected immediately south of the plant. Slight odor detected at the complainant's house. Briefed complainant.	JSH

VOC Canister Sampling

ATTACHMENT E

	3309 S. Arlington 04/09/94	3309 S. Arlington 06/13/94	2750 S. Arlington 07/01/94
Compound Name	Conc. ppb	Conc. ppb	Conc. ppb
Ethene			
Acetylene			
Ethane/Propene			
Propane	8.243		15.646
Vinyl Chloride			
2-Methylpropane	15.536		1.102
Butane	1.285		2.387
Bromomethane	5.790		1.501
t-2-Butene		0.468	1.410
Freon-11		96.155	
c-2-Butene			
3-Methyl-1-Butene			1.108
2-Methylbutane	0.889	0.573	9.449
1-Pentene	16.096		
Pentane	7.196		
Isoprene		.013	
t-2-Pentene	0.099	0.896	0.751
c-2-Pentene			
Dichloromethane			0.809
2-Methyl-2-Butene	0.046		0.347
2,2-Dimethylbutane	0.072		0.324
Cyclopenten	0.098		
4-Methyl-1-Pentene	0.250		
Cyclopentant			
2,3-Dimethylbutane	0.611		0.172
2-Methylpentane	2.472	0.164	0.733
3-Methylpentane	1.447		0.420
2-Methyl-1-Pentene			0.264
Hexane	0.238		0.414
Trichloromethane			
t-2-Hexene			
c-2-Hexene			

VOC Canister Sampling

	3309 S. Arlington 04/09/94	3309 S. Arlington 06/13/94	2750 S. Arlington 07/01/94
Compound Name	Conc. ppb	Conc. ppb	Conc. ppb
Methyleyclopentane			0.221
1,2-Dichloroethane			
2,4-Dimethylpentane	0.096		0.177
1,1,1-Trichlethane	1.338		0.474
Benzene	1.340	0.351	7.907
Tetrachloromethane	1.017		5.781
Cyclohexane	1.002		
2-Methylhexane		0.165	0.223
2,3-Dimethylpentane	0.311		0.114
3-Methylhexane		0.219	0.310
1,2-Dichloropropane	0.305		
Trichloroethene	0.334		0.200
2,2,4-Trimepentane			0.161
Heptane	0.072		0.142
Methylcyclohexane	0.101		
2,3,4-Trimepentane	0.085		
Toluene	0.620	0.756	2.051
2-Methylheptane	0.147		0.092
3-Methylheptane	0.149		0.118
1,2-Dibromoethane	0.413		
Octane	0.047		0.159
Tetrachlorethene			
Chlorobenzene	0.123		0.340
Ethylbenzene	0.525	0.268	1.013
m&p-Xylenes	1.952		3.243
Styrene	0.939		0.305
o-Xylene	0.067		
Nonane			
Isopropylbenzene	0.163		0.094
a-Pinene	0.257	0.167	0.081
Propylbenzene	0.052		0.082
B-Pinene			0.077

VOC Canister Sampling

	3309 S. Arlington 04/09/94	3309 S. Arlington 6/13/94	2750 S. Arlington 07/01/94
Compound Name	Conc. ppb	Conc. ppb	Conc. ppb
1,3,5-Trimebenzene	0.102		0.039
1,2,4-Trimebenzene	0.081		0.058
Decane	0.070		0.287
Undecane	0.152		0.058
t-1,2-diclethene		0.675	1.755
vinylidene chloride			0.606

Note: OSHA PELs - Occupational Safety and Health Administration Permissible Exposure Limits.

TWA - Time weighted average exposure concentration for a normal 8-hour workday.

STEL - Short-term exposure limit. Usually a 15-minute time weighted average exposure.



CITY OF INDIANAPOLIS

STEPHEN GOLDSMITH
MAYOR

July 25, 1994

Mr. William Freudiger
Vice President
Refined Metals Corporation
257 West Mallory Avenue
P.O. Box 9009
Memphis, TN 38109

Dear Mr. Freudiger;

The Indianapolis Air Pollution Control Section and Indiana Department of Environmental Management met with representatives of Refined Metals on June 7, 1994 to discuss an Agreed Judgement to settle outstanding violations at its Indianapolis facility. During this meeting, Refined Metals agreed to perform emissions tests of all its baghouse stacks at this facility.

Therefore, the Section requests that Refined Metals perform the following stack tests, within 60 days of certified receipt of this request:

M1 Stack

Total Suspended Particulates	Methods 1-5
Sulfur Dioxide	Method 6
Sulfuric Acid Mist	Method 8
Opacity	Method 9
Lead	Method 12
Sulfides	Method 15
Volatile Organic Compounds (VOCs)	Method 25A
Hydrogen Chloride	Method 26A

M2 Stack

Total Suspended Particulates	Methods 1-5
Opacity	Method 9
Lead	Method 12

M3 Stack

Total Suspended Particulates	Methods 1-5
Sulfur Dioxide	Method 6
Opacity	Method 9
Lead	Method 12

M4 Stack

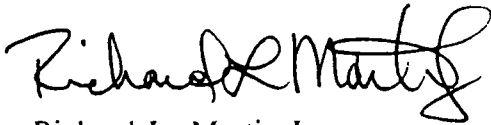
Total Suspended Particulates	Methods 1-5
Opacity	Method 9
Lead	Method 12

The tests must be performed while the equipment being tested is operating between 95% and 100% of the design capacity of the equipment. Records must be kept during the test, and included with the final report, of the quantities of material processed, including but not limited to ingot production (wt.) and charge rates into all furnaces, to insure that this requirement is

met. The Section also requests that Refined Metals submit to the Section and the Indiana Department of Environmental Management (IDEM), in writing no less than 35 days prior to the date of the stack test, a schedule of the tests and a sampling protocol for all of the tests to be performed. Within 45 days of completing the testing, a copy of the test results shall be submitted to the Section and IDEM. Accompanying the Test results submitted to the Section shall be a check for the Test Review Fee, as established by Indianapolis Air Pollution Control Ordinance, Consolidated City of Indianapolis and Marion County, Indiana, Chapter 4-54(a)(1), of \$700 per unit tested.

If you have any questions regarding this matter, please contact Jeffrey Hege at 327-2279.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard L. Martin Jr.", with a stylized, cursive script.

Richard L. Martin Jr.
Assistant-Administrator

cc: Mike Meloy, RMC
Winter Bottum, IDEM
Ed Surla, IDEM
Matt Mosier, IAPCS
Cheryl Carlson, IAPCS
Jeffrey Hege, IAPCS
Bonnie Shelton, IAPCS

ATTACHMENT G

July 6, 1994

From: Jim Homolya Radian Corporation

To: Aaron Childs Indianapolis APCD

Subject: Community Air Monitoring Project

At your request, I have prepared the following Scope of Work and Cost Estimates to Conduct a Phase I Community Air Monitoring Project in the vicinity of the Refined Metals Smelter. We understand that the objective of this project is to determine the nature of air contaminants in the neighborhood approximately 1 mile from the suspected source under prevailing wind conditions.

Radian has extensive engineering and technical experience in the secondary lead smelter source category and recommends the following approach to the characterization study:

1. During the first phase of this project, Radian will conduct an assessment of existing SO₂, particulate matter, and meteorological data already collected by your air monitoring group. During this phase, Radian will also evaluate other potential target compounds suspected to be emitted in the area.
2. After the data evaluation phase, Radian will conduct a short-term sampling effort to help determine if correlations exist between air quality contaminants and levels and the community perception of odors and discomfort. The results of this work will be evaluated to determine and/or recommend a need for a longer-term sampling program.
3. Radian will provide one portable meteorological system capable of measuring real-time wind speed, wind direction, and ambient temperature for a period of one month in the area of interest. Radian will also provide (5) high flow sampling pumps and sorbent media to collect episode samples in the event of an odor complaint from the community. This proposal assumes that we will have minimal problems accessing the sampling locations. Once the meteorological system is on-line and the performance audits are conducted, Radian will train a technician designated by the client to conduct the episode sampling and perform operational checks on the portable meteorological system. Radian will also conduct

performance audits on the existing SO₂ monitor sited in the community and the two particulate samplers (one co-located with the SO₂ monitor and the other adjacent to the smelter fence line).

4. All sorbent sample analyses will be conducted by an accredited laboratory under Radian's direction.
5. Upon completion of the 30 day meteorological data acquisition period, a final report of findings and recommendations will be prepared.
6. Our Project Manager for this effort is Mr. Tom Weed, a certified Industrial Hygienist, who has managed several projects dealing with community environmental exposure issues.
7. Within ten days notice, we can have the needed equipment on-site and conduct the installation, performance audits, and training over a four day period.

The cost of labor, materials, and expenses for this effort is \$16500.



Solid & Hazardous Waste Site Assessments
Remedial Design & Construction
Underground Tank Management
Asbestos Surveys & Analysis
Hydrogeologic Investigations & Monitoring
Analytical Testing / Chemistry
Industrial Hygiene / Hazard Communication
Environmental Audits & Permitting
Exploratory Drilling & Monitoring Wells

July 13, 1994

Mr. Aaron Childs
Manager of Air Quality
Air Pollution Control Section
City of Indianapolis
2700 South Belmont
Indianapolis, IN 4622

**RE: PROPOSAL FOR AIR CONSULTING AND LABORATORY SERVICES AT A
SECONDARY LEAD SMELTER INDIANAPOLIS, IN
ATEC PROPOSAL NUMBER: P2067**

Dear Aaron:

ATEC Associates, Inc. appreciates this opportunity to submit this scope of work and cost proposal to the Air Pollution Control Section of the Indianapolis Department of Public Works (DPW) to provide air consulting and laboratory services in support of odor complaints in the vicinity of a secondary lead smelter in the city of Indianapolis, Indiana.

Odor Investigation

During the week of June 20, 1994 at the National AWMA Conference, I met with Aaron Childs of the city of Indianapolis, and discussed potential air consulting work that DPW might need to perform in order to investigate numerous odor complaints occurring at a secondary lead smelter in Indianapolis. It is ATEC's understanding that this smelter reprocesses batteries to reclaim the metals they contain. During the reclamation process odors are noticed in the vicinity of the facility. These odors have caused numerous complaints and concerns about potential health problems. It is ATEC Associates, Inc. intention to provide air consulting services to the DPW on a time and materials basis to assist in the investigation of these odor complaints.

ATEC's technical approach will involve a three tasks:

Task 1- ATEC will perform an initial visit to the area of the facility and ascertain potential odor sources. ATEC will also review the regulatory agency files to obtain all available process information in regards to the lead smelter. This information will

help design a field sampling and analysis program.

Task 2- At present it is ATEC's assumption that the odors might either be polar or sulfur related Volatile organic compounds. Due to the fact that the odor incidents are irregular in occurrence, ATEC proposes to develop a sampling manual and train personnel from the DPW to collect samples during the times of odor complaints and ship the samples to either ATEC's laboratory in Indianapolis or to ATEC's contracted specialty laboratory. It is ATEC's intention to collect Dinitrophenylhydrazine (DNPH) treated filter cartridges, summa canisters and tedlar bags at the time of the odor incidents. The DNPH treated filter cartridges will be analyzed for aldehydes and ketones, the tedlar bags will be analyzed for sulfur related VOCs, and the summa canisters will be analyzed for Hazardous Air Pollutants (HAPs)

Task 3- ATEC will have the samples analyzed and compare the results to published odor and health standards. ATEC will provide a report summarizing the results

ATEC Associates, Inc. will not only provide the analysis of field samples collected by the DPW but ATEC Associates, Inc. will provide all sampling media, summa canisters, and tedlar bags, needed for this project. Chain of custody of all samples will be initiated in our Indianapolis laboratory with the preparation of samples to be used in the field. Samples will be returned to Indianapolis under strict custody procedures with a copy of the chain of custody forms sent to my attention. These samples will be analyzed by the appropriate laboratory and the results will be sent to Mr. Mark Greenberg for review to insure accuracy and approve the data for release to you. Mr. Mark Greenberg (National Accounts Manager, Air Services) will serve as Technical Director and Coordinator for this project.

We believe that ATEC Associates, Inc. is uniquely qualified to perform the requested services by virtue of the following considerations:

- The air consulting services and analytical support services are coming from one organization and some members of the ATEC project team that will be assigned to this project are familiar with smelter operations and expected pollutants that should be observed from the samples to be acquired.
- ATEC has successfully managed and completed many similar projects.
- These projects have included successful interface and negotiations with government agencies due to ATEC's understanding of pertinent State and Federal regulations and how they are administered.
- ATEC is committed, as a corporation, to providing for total client satisfaction for each of our projects.

Cost Estimate

ATEC Associates, Inc. will provide the technical support services requested by the DPW on a

time and materials basis according to the previously negotiated rates and standard terms and conditions.

Table 1 presents the costs for Tasks 1-2

TABLE 1

TASKS	COSTS
TASK 1- SITE VISIT AND REVIEW OF PROCESS INFORMATION	\$800
TASK 2- PREPARATION OF SAMPLING MANUAL AND DPW TRAINING	\$3,800
TOTAL	\$4,600

The laboratory analysis will be provided on a per unit cost basis. The cost for providing the DNPH cartridges, summa canisters, and tedlar bags will be provided on a time and materials basis. Table 2 presents the associated costs for Task 3. All the laboratory per sample cost also includes the costs for initiation of chain of custody procedures, the shipping of all samples and all field forms where appropriate. The DNPH impregnated media samples will be analyzed for the common ketones and aldehydes. The summa canister samples will be analyzed for the TO14 HAPs list as found in the Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air. The tedlar bags will be analyzed for the normal reduced sulfur compounds. It should be noted that there is an additional surcharge for two week and one week turn-around times of +30% and +75% respectively if needed. All other materials and supplies such as tubing and pumps can be provided on a time and materials basis. The cost for providing these materials will be provided and must be approved prior to the placement of the appropriate orders.

TABLE 2

ANALYSIS	ANALYTICAL COSTS	COSTS FOR SUMMA CANISTERS, CARTRIDGES OR TEDLAR BAGS
ALDEHYDE/KETONES	\$165/EA	\$10/EA
REDUCED SULFURS	\$275/EA	\$35/EA
TO14 HAPS	\$395/EA	\$425/EA

After initial discussion with the DPW and the development of the sampling manual, ATEC Associates will recommend what basic supplies DPW should maintain on hand in order to properly respond immediately to odor incidents.

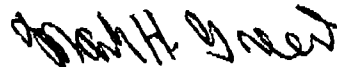
This proposal and all terms and conditions herein are subject to credit approval by ATEC

Associates, Corporate Credit Department. In order to proceed, please complete and sign the enclosed Proposal Acceptance Sheets found attached to this letter and return the indicated copy to our office by FAX or mail. Please note that this proposal is valid for a period of 90 days from the proposal date.

ATEC Associates, Inc. appreciates the opportunity to presents a cost proposal for this important program and we look forward to providing you with the professional services required to accomplish your present goals. Should you have any questions regarding this proposal, please feel free to call me at (617) 878-6200.

Sincerely,

ATEC Associates, Inc.



Mark H. Greenberg
National Accounts Manager, Air Services



Matthew C. Darney, C.P.G.
Senior Project Manager

PROJECT WORK AUTHORIZATION

Description of Services: Air Analysis-Laboratory Services
Project Name: Department of Public Works
Project Location: Indianapolis, IN 46321
Proposal No. and Date: 37.P2067; 07/13/94

CHARGE INVOICES TO THE ACCOUNT OF:

Client: Air Pollution Control Section, Indianapolis Department of Public Works.
Address: 2700 South Belmont
Indianapolis, IN 46221
Attention: Mr. Aaron Childs

Indianapolis Department of Public Works

FEE FOR SERVICES ACCEPTED BY: _____ Date: _____
Aaron Childs

PAYMENT TERMS:

Invoices for completed work will be issued by the calendar month for continuous or extended projects unless otherwise agreed.

FOR APPROVAL OF CHARGES:

If the invoice is to be mailed for approval to someone other than the account charged, please indicate in the space below.

Firm:
Address:
Attn: Phone:

This is a legal and binding contract between the CLIENT and ATEC Associates, Inc. as referenced in the attached proposal of this date and as described above.

This contract is executed and delivered by Department of Public Works to ATEC's agreement to waive the liability limitation set forth in the first sentence of General Terms and Conditions, Paragraph 7, without payment by Department of Public Works of additional consideration.

ATEC

Environmental Consultants

Division of ATEC Associates, Inc.

55 Accord Park Drive

Rockland, MA 02370

(617) 878-6200 FAX (617) 871-6781

FROM:

MARK GREENBERG

COMPANY:

Indianapolis DPW

ATTENTION:

AARON Childs

FAX TELE:

REG. TELE:

TOPIC:

Please del. ASAPThanksMARK GREENBERG

NO. PAGES:

6

DATE:

7/13/94



CITY OF INDIANAPOLIS

STEPHEN GOLDSMITH
MAYOR

August 3, 1994

Radian Corporation
P.O. Box 13000
Research Triangle Park, NC. 27709

Dear Mr. Homolya:

After reviewing your "Scope of Work and Cost Estimates to conduct a Phase I community Air Monitoring Project" dated July 6, 1994, there are a few points for which I need further clarification.

Items 2 and 3 discuss the sampling you propose to perform. I would like to know what the "short-term sampling effort" will include. How many samples? What will you be sampling for? What type of sorbent media will be used? What time periods will be used for sampling? Performance audits on the existing SO₂ monitor and the two particulate samplers are already being done by our agency. Could you explain the need to perform additional audits? Finally, could you indicate the turn around time for results of samples collected?

I realize Radian has been involved with air monitoring projects for a long time. However, I would appreciate you listing similar projects you have conducted around secondary lead smelters and include references for those projects.

I hope you understand our needs to know "up-front" what your proposal includes. Before our agency can decide on a plan and consultant we want to know as much as possible. Thank you for your help.

Sincerely,

Aaron Childs, Air Monitoring Manager, ERMD, Air Pollution Control Section



CITY OF INDIANAPOLIS

STEPHEN GOLDSMITH
MAYOR

August 3, 1994

Mark Greenberg
ATEC Associates, Inc.
55 Accord Park Drive
Rockland, MA. 02370

Dear Mr. Greenberg:

Staff of the Air Pollution Control Section has reviewed your proposal for air consulting and laboratory services dated July 13, 1994. The following questions are a result of that review.

Task 1 discusses that ATEC will "ascertain potential odor sources". Could you be more specific as to how you will perform this task?

Task 2 refers to the sampling you plan to conduct. We would like more information about DNPH treated filter cartridges and which aldehydes and Ketones you plan to measure. How will you analyze the sulfur related VOCs in the tedlar bags? What will the frequency of sampling be? How many samples will need to be collected? Which Hazardous Air Pollutants do you intend to analyze? Finally, could you indicate the turn around time for results of samples collected?

Task 3 states you will compare results to published odor and health standard. Many compounds do not have "standards". How useful will this really be? Could you discuss this in more detail?

One final request I have for you is to list similar projects that ATEC has conducted and include references for those projects.

I hope to receive a response to the above questions soon. We will then be able to decide on a plan and consultant. Thank you.

Sincerely,

Aaron Childs, ERMD, Air Monitoring Manager, Air Pollution Control Section



FRANKLIN TOWNSHIP CIVIC LEAGUE, INC.

Indianapolis, Indiana 46239

8911 Southeastern Avenue
(317) 862-1774

The Air Pollution Control Board
City of Indianapolis
City-County Building
200 E. Washington St.
Indpls. IN 46204

July 13, 1994

RE: Refined Metals, Inc.

Dear Board Members:

The Franklin Township Civic League, Inc. would like to respectfully request that the Air Pollution Control Board, acting on behalf of the City of Indianapolis to ensure air quality, review the current and past operation of Refined Metals, Inc. and take immediate steps to correct what we view to be a potentially serious threat to the quality of life in our community.

We believe it is an obligation of this city's administration to take proactive, preventative action on behalf of the neighborhoods when matters of concern are brought to its attention - particularly when those matters directly impact the health and environment of the community. The continued operation of Refined Metals, Inc. under existing conditions is such a matter.

Some opinions have been advanced that this lead recycling/smeltering plant does not pose a clear and immediate threat. It is possible that, at this time, environmental testing does not meet some governmental criteria for priority intervention. If that theory is being accepted as just cause for allowing the continued operation of Refined Metals, Inc., then we must ask why it is necessary to permit possible environmental hazards to reach critically serious levels before our laws and elected officials can afford any protection to the community?

While it may be appropriate to allow industry some degree of latitude in coming into compliance with constantly changing environmental regulations, the long history of violations and investigations promulgated at local, state and federal levels by Refined Metals, Inc. seems a clear abuse of every safeguard provided to residents by those very regulations.

Another issue that we request you address is an apparent expectation by some employees of enforcing agencies that residents in this neighborhood be totally conversant with every potential hazard and make specific requests to have the various hazards investigated. If the citizens of this

community had expert knowledge of industrial hazards and could ascertain impacts independently, there would be no need of the experts, inspectors and investigators employed by the government. Residents should rightfully be guaranteed that the government will act on their behalf without explicit technical direction.

We appreciate your willingness to carefully scrutinize all factors surrounding this issue and to exercise your best judgement to protect the current and future interests of the community by bringing Refined Metals, Inc. into compliance with any and all environmental and operational regulations and to act appropriately to enforce continuous compliance with those regulations.

Sincerely,

Catherine A. Burton

Catherine A. Burton,

President

Franklin Township Civic League, Inc.

cc: Mayor Steven Goldsmith
Councillor David Smith
Councillor Cory O'Dell
Governor Evan Bayh
Senator Patricia Miller

BANK ONE

BANK ONE, INDIANAPOLIS, NA
Indianapolis, Indiana 46277

VIA TELECOPIER

DATE: 7-15-94

TO: Rick Martin

Please include in the last Air Board Meeting
& Forward Copies to Each Board Member

TELEPHONE #

TELECOPIER #

FROM:

Row Detar

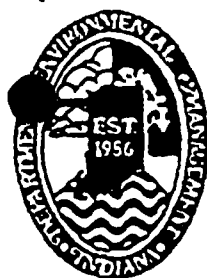
BANK ONE, INDIANAPOLIS, N.A.
ACCOUNTS MANAGEMENT-INSTALMENT LOAN DEPT.
ATTN:
P.O. BOX 77022
INDPLS, IN 46277
TELECOPIER # (317) 321-8635

MODEL: PITNEY BOWES, MODEL NO. S100 (AUTOMATIC)

THIS TRANSMITTAL CONSISTS OF 2 PAGES INCLUDING THIS
COVER SHEET

IF YOU DO NOT RECEIVE THE ENTIRE TRANSMITTAL, PLEASE CONTACT
(317) 321-8847 AS SOON AS POSSIBLE.

C1



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Evan Bayh
Governor

Kathy Prosser
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

May 23, 1994

VIA UPS

Mr. Robert N. Steinwurtzel, Esquire
Andrews & Kurth L.L.P.
1701 Pennsylvania Avenue, N.W.
Suite 200
Washington, D.C. 20006

Re: Commissioner of the Department of
Environmental Management
v.
Refined Metals Company
Cause No. A-2521

Dear Mr. Steinwurtzel:

This is to advise you that the Commissioner of the Department of Environmental Management of the State of Indiana took the following action.

The Preliminary Agreed Order in the above-referenced cause, signed by T. W. Freudiger on behalf of the Refined Metals Company was considered, and has been approved and executed. A copy of the signed Preliminary Agreed Order is enclosed.

We request that representatives of the Refined Metals Company attend a meeting at 11:00 a.m. on Friday, May 27 to discuss resolution of the remaining issues regarding alleged violations by Refined Metals Company. The meeting is to take place at the same location as our previous meeting, 13th Floor, Indiana Government Center North, 100 N. Senate, Indianapolis, Indiana. If you have any questions, please contact David McIver of my staff at (317) 233-5969.

Sincerely,

David F. Valinecz, Chief
Air Section, Office of Enforcement

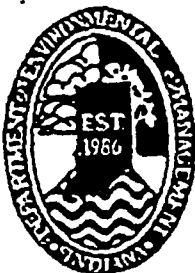
Enclosure

cc: Stephen Rothblatt, U. S. EPA Region 5
Marion County Health Department
Office of Legal Counsel
David P. McIver
Leslie H. Williams, Office of the Attorney General
Winter Bottom, OAM
Richard T. Sekula, OAM
Enforcement File

RECEIVED

MAY 24 1994

State Of Indiana
Department of Environmental Management
Office Of Air Management



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Evan Bayh
Governor
Kathy Prosser
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

STATE OF INDIANA)
COUNTY OF MARION)

SS: BEFORE THE INDIANA DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT

COMMISSIONER OF THE DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT,

Complainant,

v.

REFINED METALS COMPANY

Respondent.

CAUSE NO. A-2521

PRELIMINARY AGREED ORDER

The Commissioner and the Respondent hereby consent to the entry of the following Findings of Fact and Order.

I. FINDINGS OF FACT

Upon the consent of the parties hereto, the following findings are made:

1. Complainant is the Commissioner (hereinafter referred to as "Complainant") of the Indiana Department of Environmental Management (hereinafter referred to as "IDEM"), a department of the State of Indiana created by IC 13-7-2-11.
2. Refined Metals Company, (hereinafter referred to as "Respondent"), owns and operates a secondary lead smelter, located in Beech Grove, Indiana.
3. Complainant has jurisdiction over the Respondent and the subject matter of this action.
4. On March 17, 1994, Office of Air Management staff conducted an inspection of Respondent's operations. Inspection of Respondent's records showed that negative pressure had not been maintained continuously in the buildings housing the blast furnace, dust furnace, refining kettles, casting operation, and lead storage as required by Section 1 (1) of the emergency rule (a noncode provision concerning source specific provisions for Refined Metals Company) approved by the Indiana Air Pollution Control Board on January 5, 1994 and effective for the period from January 6, 1994 through April 5, 1994. Failure

Agreed Order
Page 2

to maintain continuous negative pressure in the aforementioned buildings constitutes an alleged violation of the aforementioned emergency rule.

5. Respondent waives its right to issuance of a Notice of Violation and to the settlement period of sixty (60) days as provided for by IC 13-7-11-2(b) with regards to the alleged violation noted in Paragraph 4 above.
6. Complainant's and Respondent's representatives met on April 15 to discuss concerns raised by the above noted alleged violation, as well as evidence indicating that the National Ambient Air Quality Standard for Lead was exceeded at the Indianapolis Air Pollution Control Section's monitoring site (site 28) located at 3700 South Arlington for the period of January through March 1994. The Respondent's and Complainant's representatives discussed a number of possible remedies regarding upgrades and improvements at Respondent's operation designed to address those concerns.
7. In agreeing to the issuance of and entering into this Order, the Respondent does not admit liability with respect to the alleged violations.
8. Respondent waives any right to administrative and judicial review of this Agreed Order and agrees not to contest the jurisdiction of Complainant to enter into this Order. This preliminary Agreed Order is intended to set forth the initial actions Respondent must take to mitigate the alleged violations in Finding No. 4 above. It is not intended to resolve the issue of a civil penalty, if any, to be paid as a result of the alleged violations or set forth all actions Respondent ultimately may have to take to remedy the alleged violations in Finding No. 4 above. Complainant reserves all rights under IC 13-7-11-2 and IC 13-7-13 to assess and collect a civil penalty for the alleged violations either pursuant to a final Agreed Order negotiated by the parties or by the issuance of a Commissioner's Order, or pursuant to any other legal authority. Nor does this Preliminary Agreed Order preclude Complainant from commencing enforcement action for any alleged violations. Respondent reserves its legal rights to contest any subsequent enforcement actions.

II. ORDER

WHEREFORE, based upon the Findings of Fact and upon the consent of the parties, it is hereby ORDERED that:

1. The Respondent shall install new bags in its M4 dust collector no later than June 1, 1994.
2. The Respondent shall seal the material storage building so that it can be maintained under negative pressure, and so that there are no visible openings from the interior to the exterior or vice versa (other than doorways) no later than July 20, 1994. This shall include, where appropriate, the raising of concrete walls on the east side, sheet metal replacement, and application of sealant.

Agreed Order
Page 3

3. The Respondent shall enclose the area between the material storage building and battery breaker as shown in Attachment A. Enclosure of that area shall be completed no later than June 20, 1994.
4. The Respondent shall install a double doorway in the west side of the material storage building to accommodate truck traffic, and abandon use of the doorway on the northeast side of the building. This project shall be completed no later than July 20, 1994.
5. The Respondent shall submit a proposal to the IDEM for approval regarding thorough cleaning of all vehicle wheels of vehicles exiting the material storage building. The proposal shall be submitted no later than June 20, 1994, and if approved shall be implemented no later than sixty (60) days after Respondent receives such approval.
6. The Respondent's May 4, 1994 revision of its fugitive dust control program (Attachment B) is hereby made a part of this Preliminary Agreed Order, and may be enforced as such. The Respondent shall comply with the requirements of the fugitive dust control program. The Respondent shall work with the IDEM to revise the program as needed to assure minimization of fugitives as the facility improvements required in this Preliminary Agreed Order are implemented. However, any lead containing material tracked out of, or otherwise deposited on the ground outside of Respondent's buildings shall be cleaned up immediately.
7. The Respondent shall enclose the areas at the bottoms of its baghouses. These enclosures shall be completed no later than July 20, 1994.
8. Unless IDEM otherwise notifies Respondent in writing, all submittals required by this Preliminary Agreed Order shall be sent to:

Air Section Chief
Office of Enforcement
Indiana Department of
Environmental Management
P.O. Box 6015
Indianapolis, Indiana 46206-6015
9. This Preliminary Agreed Order shall be valid and enforceable the date it is adopted by the Complainant or her delegates. However, all time periods shall run from the date Respondent receives this Order (hereinafter called "Effective Date"). This Preliminary Agreed Order shall remain in effect until the requirements in Order Paragraphs 1 through 7 have been met, or until the requirements of this Preliminary Agreed Order have been incorporated into a Final Agreed Order, whichever occurs first.

CT

Agreed Order
Page 6

TECHNICAL RECOMMENDATION:
Department of Environmental
Management

By: [Signature]
Air Section Chief
Office of Enforcement

Date: 5-16-94

RESPONDENT

By: [Signature]
Printed: T. W. Prudiger

Title: VICE President

Date: 5-18-94

COUNSEL FOR COMPLAINANT
Department of Environmental
Management

By: [Signature]
Office of Legal Counsel

Date: 5-20-94

COUNSEL FOR RESPONDENT

By: [Signature]
Date: May 17, 1994

APPROVED AND ADOPTED BY THE INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

THIS 20th DAY OF May, 1994.

For the Commissioner:

[Signature]
Rosemary G. Spalding
Deputy Commissioner

DAN COATS
INDIANA

COMMITTEES:
ED SERVICES
OR AND HUMAN
RESOURCES

United States Senate

WASHINGTON, DC 20510-1403

July 19, 1994

RICHARD G. LUGAR
INDIANA

COMMITTEES:
AGRICULTURE
FOREIGN RELATIONS
SELECT INTELLIGENCE
JOINT ORGANIZATION OF
CONGRESS

RECEIVED

JUL 22 1994

Ms. Kathy Prosser, Commissioner
Indiana Department of Environmental Management
P.O. Box 6015
Indianapolis, Indiana 46206-6015

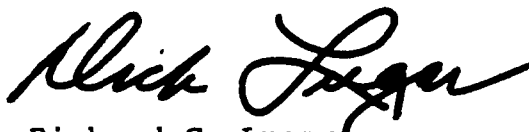
Dear Ms. Prosser:

We have received the enclosed correspondence from Mr. Brad Scales of Huntingburg, Indiana. Mr. Sclaes owns a large tract of undeveloped property near the Refined Metals Corporation, Inc. and has concerns about the potential release of lead from this plant contaminating his property. Mr. Scales has also indicated that he does not believe the public welfare has not been protected in this matter.

We would appreciate receiving any information you can provide regarding the current status of efforts to bring this company into compliance with the Clean Air Act and other regulatory provisions applicable to of lead. The U.S. Senate recently passed S. 729, the Lead Exposure Reduction Act in order to abate what is known as the most prevalent disease of environmental origin among American children and which can also affect adults when they are exposed to high lead levels.

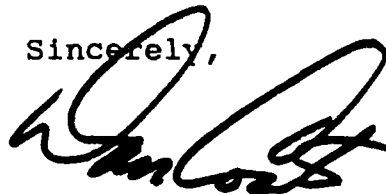
We appreciate your assistance in responding to our inquiry on behalf of Mr. Scales. Should you have additional questions please contact Mr. Lane Ralph of our Indiana staff at 1180 Market Tower, 10 West Market Street, Indianapolis, Indiana 46204-2964 or telephone 317-226-5555. Thank you.

Sincerely,



Richard G. Lugar
United States Senator

Sincerely,



Dan Coats
United States Senator

Enclosure

cc: Alan Moberly, Marion County Health Department

~~Richard Martin, Indianapolis Air Pollution Control Section~~

Valdas Adamkus, Regional Administrator, U.S. EPA, Region V

07-12-94

1 OF 15

FAX COVER SHEET

TO : Senator Dick Lugar
Senator Dan Coats

FAX # 1-317-226-5508

FROM : Brad Scales , Huntingburg, IN FAX # non-responsive

Attn : Lane Ralph .

Ref: Concerns I have being a property owner east of " Refined Metals " , Marion County , Indianapolis , Indiana .

Enclosed : Copy of a memorandum I received after telephone inquiries of several individuals and all applicable City / County / State Agencies .

Dear Senators ,

Please find attached copies of a memorandum I received after expressing concern over what I have come to learn is a glaring example of the public good " not " being protected by the various Federal , State , and Local Agencies that are responsible .

The health , welfare , and general well-being of the local property owners is being sacrificed as a direct result of either ineptitude , or the presence of a wide spread c.y.a. approach to dealing with the public condition .

I would very much appreciate it if you could have an aid familiar with the E.P.A. make an inquiry of the agencies' position and future intent with what appears to be a protracted and extremely harmful nonresolution of Corporate behavior that speaks directly to the impotence of Federal / State / and Local Agencies .

Keep up the good work,



Copies to :

Congressman Lee Hamilton

Brad Scales
non-responsive




Significant Action

The Department of Justice filed suit against Refined Metals Corporation (RMC) of Indianapolis, Indiana on November 21, 1990, for violations of the Resource Conservation and Recovery Act (RCRA), and the Clean Air Act. The suit contends that the interim status of RMC waste piles terminated on November 8, 1985, because RMC failed to certify compliance with Indiana's financial responsibility requirements. The suit also alleges that the release of hazardous waste into the environment from the RMC facility has resulted in the contamination of soil in and around the RMC facility. Finally, the suit alleges that RMC had violated the Indiana State Implementation Plan by exceeding the limitations on total suspended particulate matter and lead emissions from Refined Metals' blast furnace. This lawsuit continues the Region V emphasis on multi-media environmental enforcement.

The relief sought by this suit is to bar RMC from storing any additional hazardous waste in its waste piles, to close the waste piles, to remedy all contamination in and around the RMC facility resulting from the release of hazardous waste, including release to the ground water, and to pay a civil penalty.

REB Contact: Jonathan Adenuga (6-7954)
ORC Contact: Thomas Jacobs (3-7448)